

**LEAD-BASED PAINT INSPECTION AND
RISK ASSESSMENT REPORT
APARTMENT COMPLEX NO. 2
VA MEDICAL CENTER
MILES CITY, MONTANA**

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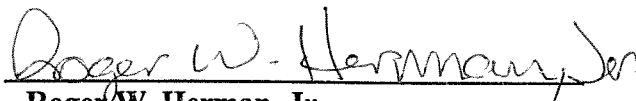
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EXECUTIVE SUMMARY

Maxim Technologies, Inc. (Maxim) was retained by the Veterans Administration Medical Center Healthcare System to perform Lead-Based Paint (LBP) inspection and risk assessment services for Apartment Complex No. 2 at the Veterans Administration (VA) Medical Center in Miles City, Montana. Apartment Complex No. 2 was inspected on December 6 and 7, 2000, by Maxim Environmental Technician, Mr. Ryan Behrends.

Apartment Complex No. 2 was constructed during 1948 and is a two-story brick building with a partial basement. The apartment complex is sub-divided into four separate units (A, B, C and D). Units A, B, and D and the exterior of the building were inspected. However, Unit C was inaccessible at the time of our survey. All units were occupied at the time of our survey. The building has approximately 5,012 square feet of interior floor space. Painted finishes of the building include wood and metal window components, wood and metal doors, wood trim, metal soffits, sheetrock and plaster walls and ceilings.

Lead-Based Paint Inspection

Fourteen painted building components had surface coatings which are considered to be Lead-Based Paint (LBP)¹:

- White painted wood columns in front of the building
- White painted wood sign on the south column, on the exterior
- White painted wood window frames around the front door
- White painted wood front entrance door
- White painted wood interior window sills throughout
- White painted wood interior window frames throughout
- Interior wood door frames throughout the building
- White painted wood rail cap, in the second floor hall
- White painted metal railing, in the second floor hall
- White painted wood cabinet doors in laundry room vestibule
- White painted wood baseboard throughout
- White painted cabinet doors in kitchen Unit A
- White painted wood ironing board cabinet door in Unit A
- White painted wood screw board in closet Unit A

The general condition of the paint on the above components ranges from poor to intact.

¹ Under regulations promulgated under the Toxic Substance Control Act (TCSA), the Housing and Community Development Act (Title X), and the Lead-Based Paint Poisoning Prevention Act (LBPPP), lead-based paint is defined as paint or other surface coatings that contain lead in excess of 1.0 milligrams per centimeter squared or 0.5 percent by weight.

Lead Risk Assessment

Maxim conducted a lead risk assessment to determine the presence or absence of lead-based paint hazards, as summarized below.

Paint-Lead Hazards

The following paint-lead hazards² were identified at the site:

- White painted wood interior window sills
- White painted wood interior window frames

The following impact surfaces were covered with lead-based paint. However, the paint was in fair to intact condition:

- White painted wood front entrance door
- White painted wood rail cap
- White painted metal railing
- White painted wood cabinet doors in laundry room vestibule
- White painted cabinet doors in kitchen Unit A
- White painted wood ironing board cabinet door in Unit A

Dust-Lead Hazards

The following dust-lead hazards³ were identified at the site:

- Laundry room floor

² According to amendments to 40 CFR, Part 745, paint-lead hazards are defined as:

- 1) Any lead-based paint on a friction surface that is subject to abrasion and where the lead dust levels on the nearest horizontal surface underneath the friction surface are equal to or greater than the specified dust-lead hazard levels or;
- 2) Any damaged or otherwise deteriorated lead-based paint on an impact surface that is caused by impact from a related building component or;
- 3) Any chewable lead-based painted surface on which there is evidence of teeth marks; or
- 4) Any other deteriorated lead-based paint in any residential building or child-occupied facility or on the exterior of any residential building or child-occupied facility.

³ According to amendments to 40 CFR, Part 745, dust-lead hazards are defined as surface dust in a residential dwelling or child-occupied facility that contains a mass-per-area concentration of lead equal to exceeding 40 micrograms per square feet ($\mu\text{g}/\text{ft}^2$) on floors or 250 $\mu\text{g}/\text{ft}^2$ on interior window sills based on wipe samples.

Soil-Lead Hazards

No soil-lead hazards⁴ were identified at the site.

Lead-in-Drinking Water Hazards

No hazards associated with lead-in-drinking water⁵ were identified at the site.

Conclusions

Based on Maxim's assessment of Apartment Complex No. 2, we recommend disclosing the presence of lead-based paint within the building to present and future tenants. The disclosure should include guidance documents informing them of proper cleaning and maintenance procedures for lead-based painted components within the building.

In addition, if the building is sold, the findings presented in this report should be conveyed to the potential buyers of the building. The guidance information to be provided to tenants is presented in the appendices of this report. We recommend that the VA Medical Center evaluate the management recommendations and associated cost with each of the management scenarios in terms of the future use of the building.

The settled dust wipe sample collected from the floor of the laundry room indicated a lead concentration of 98.2 $\mu\text{g}/\text{ft}^2$. According to amendments to 40 CFR, Part 745, dust-lead hazards are defined as surface dust in a residential dwelling or child-occupied facility that contains a mass-per-area concentration of lead equal to exceeding 40 micrograms per square feet ($\mu\text{g}/\text{ft}^2$) on floors or 250 $\mu\text{g}/\text{ft}^2$ on interior window sills based on wipe samples. Maxim recommends that the floor of the laundry room be cleaned by wet mopping the floor with a trisodium phosphate detergent at least weekly until a remediation alternative is selected and implemented for painted building components. If the floor or other surfaces in the area are to be vacuumed, only HEPA filtered vacuums should be used to minimize dispersal of air-borne concentrations of lead and re-contamination of the laundry room floor or adjacent areas. With the findings of lead-based paint in the building and the lead dust concentration on the floor of the laundry room, HUD recommends that a reevaluation schedule be developed based on the initial evaluation results and remediation actions taken. We recommend the V.A. Health Care System consider future use of the building to determine what remediation actions are to be taken in the laundry room or in any other areas where lead-based paint was identified.

⁴ According to amendments to 40 CFR, Part 745, soil-lead hazards are defined as bare soil on residential real property or on the property of a child-occupied facility that contains total lead equal to or exceeding 400 parts per million (expressed as micrograms per gram) in a play area or average of 1,200 parts per million of bare soil in the rest of the yard based on soil samples.

⁵ Under 40 CFR, Part 141 (National Drinking Water Standards for Lead), the maximum contaminant level for lead in drinking water is 0.015 milligrams per liter (mg/L).

1.0 INTRODUCTION

This report provides a summary of the lead-based paint inspection and lead exposure risk assessment conducted by Maxim Technologies, Inc. (Maxim) on December 6 and 7, 2000. Three of the four units (A, B and D) and the exterior of the building were inspected in Apartment Complex No. 2 on the Veterans Administration (VA) campus in Miles City, Montana. The work was conducted in accordance with our proposal dated November 16, 2000. Unit C was not accessible at the time of the inspection. Apartment Complex No. 2 was inspected on December 6 and 7, 2000, by Maxim Environmental Technician, Mr. Ryan Behrends. Qualifications and accreditation certificates of the inspectors and risk assessors are presented in Appendix A.

2.0 PROCEDURES

The work conducted by Maxim included an inspection for Lead-Based Paint (LBP) and an assessment of risk for exposure to lead. The inspection and risk assessment was performed using the protocol presented in *Guidelines for the Evaluation and Control of Lead-Based Paint Hazards in Housing* (U.S. Department of Housing and Urban Development, 1995, revised 1997 and 2000) and *40 CFR Part 745: Identification of Dangerous Levels of Lead, Final Rule* (Federal Register, January 5, 2001).

Lead-based paint is of concern both as a source of direct exposure through ingestion of paint chips and as a contributor to lead in interior dust and exterior soil. Regulatory agencies, which have addressed lead-based paint, include the U.S. Environmental Protection Agency (EPA), U.S. Department of Housing and Urban Development (HUD), U.S. Occupational Safety and Health Administration (OSHA), and the U.S. Consumer Products Safety Commission (CPSC).

2.1 Lead-Based Paint Inspection

Maxim personnel conducted a lead-based paint inspection in the accessible units of Apartment Complex No. 2. EPA and HUD define an inspection as a surface-by-surface investigation to determine the presence of lead-based paint. Lead-based paint is defined as surface coatings with a lead concentration of 1.0 mg/cm^2 or 0.5 percent by weight (Title X and 40 CFR Part 745). Maxim generally followed the HUD lead-based paint survey guidelines (HUD, 1995, revised 1997 and 2000).

The inspection included documenting types of painted building components, substrate material and general paint colors. Typical building components included walls, floors, ceilings, door units, window units, baseboards, stairway components, radiator or cabinet type heat units, structural members, and mechanical system components. Typical substrate materials included metal, plaster, wood, and sheetrock. The painted building components were described based on specific component type and substrate material. The color of each component was also documented.

Maxim used field X-Ray Fluorescence (XRF) methodology. XRF is identified as the recommended method to determine lead in paint (HUD, 1995, revised 1997 and 2000). For this inspection, Maxim personnel utilized the Niton XL, Spectrum Analyzer XRF, which automatically calculates

measurable amounts of lead in paint by correcting for substrate conditions. An *XRF Performance Characteristic Sheet* for the XRF used by Maxim specifies the ranges where XRF results are positive, negative, or inconclusive. The *Performance Characteristic Sheet* for this instrument is presented in Appendix B. The XRF readings obtained during this investigation are presented in Appendix B.

2.2 Lead-Based Paint Risk Assessment

Risk assessments determine the presence of absence of lead-based paint hazards and suggest appropriate hazard control measures. Lead-based paint hazards are defined as hazardous lead-based paint, dust-lead hazard, or soil-lead hazard (40 CFR, Part 745). The risk assessment conducted as part of this project also included an evaluation for risk associated with lead-in-drinking water. Maxim generally followed lead-based paint risk assessment guidelines established by HUD (HUD, 1995, revised 1997 and 2000).

2.2.1 Resident Questionnaires

Maxim provided VA Property Management personnel with *Resident Questionnaires* for distribution to the dwelling occupants. The completed questionnaires were reviewed to determine occupant use patterns and activities. In addition, Maxim interviewed the dwelling occupants to obtain further information that might indicate lead exposure risk. The questionnaires and interview information were used to identify potential lead exposure risks. On-site areas identified during the review of questionnaires were given priority during the assessment. Copies of the completed *Resident Questionnaires* are included in Appendix C.

2.2.2 Visual Assessment and Paint-Lead Hazards

The visual assessment was conducted to locate potential lead-based paint hazards. According to amendments to 40 CFR, Part 745, paint-lead hazards are defined as:

- 1) Any lead-based paint on a friction surface that is subject to abrasion and where the lead dust levels on the nearest horizontal surface underneath the friction surface are equal to or greater than the specified dust-lead hazard levels or;
- 2) Any damaged or otherwise deteriorated lead-based paint on an impact surface that is caused by impact from a related building component or;
- 3) Any chewable lead-based painted surface on which there is evidence of teeth marks; or
- 4) Any other deteriorated lead-based paint in any residential building or child-occupied facility or on the exterior of any residential building or child-occupied facility.

The condition of painted surfaces were noted on the XRF Reading Summary sheets, presented in Appendix B. The resident questionnaires were used to determine areas frequented by children.

2.2.3 Dust-Lead Hazards

According to amendments to 40 CFR, Part 745, dust-lead hazards are defined as surface dust in a residential dwelling or child-occupied facility that contains a mass-per-area concentration of lead equal to or exceeding 40 micrograms per square foot ($\mu\text{g}/\text{ft}^2$) on floors or 250 $\mu\text{g}/\text{ft}^2$ on interior window sills based on wipe samples. XRF test results were used to determine where lead-based paint was present on surfaces inside the building as well as on the exterior of the building. Although the paint on the interior surfaces was either considered intact or in fair condition, it was identified on doors and windows from which lead dust may be produced from the friction points of these components.

The samples were collected using a wet disposable wipe to collect the dust from a measured area from each surface tested, as recommended by the HUD guidelines. Samples were obtained from representative floors and windowsills in the selected units and the laundry room. Samples were submitted under proper chain of custody protocol to EMSL in Atlanta, Georgia for analysis. Laboratory analytical reports are presented in Appendix D.

2.2.4 Soil-Lead Hazards

According to amendments to 40 CFR, Part 745, soil-lead hazards are defined as bare soil on residential real property or on the property of a child-occupied facility that contains total lead equal to or exceeding 400 parts per million (expressed as micrograms per gram) in play areas or average of 1,200 parts per million of bare soil in the rest of the yard based on soil samples. The HUD guidelines further specify soil samples should be collected from areas of bare soil greater than nine square feet in size. No areas of bare soil greater than nine square feet in size were observed in the yard surrounding this building.

2.2.5 Lead-in-Drinking Water Hazards

Water sampling was conducted to determine if the water may be a source of lead ingestion for residents in Apartment Complex No. 2. Although water sampling is not required in a routine lead risk assessment, at the request of the Veteran's Administration, Maxim has included water sampling.

A water sample was collected in the morning before any water was drawn through the pipes for the day. In most situations this "first draw" sample represents the worst-case situation, if lead is being leached from the faucet or fixture, piping or solder. A second sample was collected after the water had been ran for approximately five minutes to flush the pipes of any stagnant water. This sample represents water from the supply line entering the building.

Samples were submitted under proper chain of custody protocol to EMSL in Atlanta, Georgia for analysis. Laboratory analytical reports are presented in Appendix D.

3.0 FINDINGS

Apartment Complex No. 2 was constructed during 1948 and is a two-story brick building with a partial basement. The apartment complex is sub-divided into four separate units (A, B, C and D). Units A, B, and D and the exterior of the building were inspected. Unit C was inaccessible at the time of our survey. All units were occupied at the time of our survey.

The building has approximately 5,012 square feet of interior floor space. Painted finishes of the complex include wood and metal window components, wood and metal doors, wood trim, metal soffits, sheetrock and plaster walls and ceilings.

At the time of Maxim's site visit the paint on the interior of the building was generally in good condition with the exception of some of the painted surfaces in the laundry room. The paint on the exterior of the building was in fair to good condition at the time of Maxim's site visit. No paint chips were visible on the ground around the perimeter of the building.

Apartment Complex No. 2 was inspected on December 6 and 7, 2000, by Maxim Environmental Technician, Mr. Ryan Behrends. The following sections describe the results of Maxim's inspection and risk assessment.

3.1 Lead-Based Paint Inspection

XRF testing indicated that lead-based paint is present on interior and exterior components of Apartment Complex No. 2. Fourteen painted building components were identified which had surfaces covered with LBP, as summarized in Table 3.1 below. Lead-based painted building components and positive XRF reading locations are presented on Figure 1.

TABLE 3.1 APARTMENT COMPLEX NO. 2 SUMMARY OF LEAD-BASED PAINT		
Building Component and General Location	Current Paint Color†	Lead Concentration mg/cm ² *
Columns on either side of the front door to the building	White	>5.0
Wood sign on south column on the exterior	White	1.8
Wood window frames around front door	White	>5.0
Wood front entrance door	White	>5.0
Interior wood window sills throughout	White	1.8 (Avg.)
Interior wood window frames throughout	White	1.7 (Avg.)
Interior wood door frames throughout	White	2.0 (Avg.)
Wood rail cap in the 2 nd floor hall	White	>1.2
Metal railing in the second floor hall	White	>5.0

TABLE 3.1
APARTMENT COMPLEX NO. 2
SUMMARY OF LEAD-BASED PAINT

Building Component and General Location	Current Paint Color†	Lead Concentration mg/cm ² *
Wood cabinet doors in laundry room vestibule	White	1.9 (Avg.)
Wood baseboard throughout	White	2.0
Cabinet doors in kitchen, Apartment A	White	1.5 (Avg.)
Wood ironing board door in Apartment A	White	1.3
Wood screw board in bedroom closet, Apartment A	White	2.0
† Color as of the date of the inspection and may not reflect conditions at a later date.		
* mg/cm ² = milligrams per square centimeter		

The general condition of the paint on the above components ranges from poor to intact. In general, the only components with evidence of poor condition paint were the window frames. The condition of the remaining components was fair to intact.

3.2 Lead-Based Paint Risk Assessment

Several lead hazards were identified during our assessment. The individual hazards are discussed in the following sections.

3.2.1 Resident Questionnaire Evaluation

Resident questionnaires were evaluated prior to the collection of surface dust sample to identify if children are present in the home and where they spend time. These elements were considered by the risk assessor in selecting potential sampling locations with respect to those areas frequented by children.

Apartment A was the only unit in this building with a teething age child (approximately eleven months old) currently living in the unit. During Maxim's site visit no visible evidence of teething marks were evident on the windowsills, door frames, or doors in this unit. The windows in the living room in Apartment A were opened most frequently. In addition, the living room window was used for a window air conditioner. The primary location where the teething age child played was in the living room. No other risk factors were identified during the review of the questionnaire completed by the occupants of Unit A.

No children were present in Unit B. No other risk factors were identified during the review of the questionnaire completed by the occupants of Unit B.

The occupants of Unit C did not return the questionnaire to Maxim. No assessment was conducted for this unit.

One child was present in Unit D. The child was eight years old at the time of the inspection. During Maxim's site visit no visible evidence of teething marks were evident on the windowsills, door frames, or doors in this unit. All windows in Apartment C were opened most frequently. In addition, the living room window was used for a window air conditioner. The primary location where the child played was in the living room or his bedroom. No other risk factors were identified during the review of the questionnaire completed by the occupants of Unit D.

3.2.2 Paint-Lead Hazards

Paint lead hazards were determined using XRF results, results of resident questionnaire, and the visual assessment of the painted surfaces. The following paint-lead hazards were identified in Apartment Complex No. 2.

TABLE 3.2 APARTMENT COMPLEX NO. 2 SUMMARY OF PAINT-LEAD HAZARDS				
Building Component and General Location	Current Paint Color†	Lead Concentration Mg/cm ² *	Condition	Recommended Management Action**
Interior wood window sills throughout	White	1.8 (Avg.)	Poor to intact	Replace/repair to intact condition
Interior wood window frames throughout	White	1.7 (Avg.)	Poor to intact	Replace/repair to intact condition
†	Color as of the date of the inspection and may not reflect conditions at a later date.			
*	mg/cm ² = milligrams per square centimeter			
**	Repair = Remove all loose paint, clean up all paint chips and dust using a vacuum equipped with a HEPA filter and refinish surface to clean, tight condition.			
	Replace = Remove existing component and replace with new component.			

These components are accessible to young children living in this building. In addition, the condition of the paint on these components was poor in places. However, the concentration of lead in dust samples collected from near these components were below levels considered to be dust-lead hazards (presented in the next section).

Lead paint was identified on the following impact surfaces:

- White painted wood front entrance door
- White painted wood rail cap in the second floor hall
- White painted metal railing in the second floor hall
- White painted wood cabinet doors in laundry room vestibule

- White painted cabinet doors in kitchen Unit A
- White painted wood ironing board cabinet door in Unit A

The paint surfaces on these components were in intact to fair condition.

3.2.3 Dust-Lead Hazards

Based on the laboratory results of wipe samples, the following dust-lead hazards were identified:

TABLE 3.3 APARTMENT COMPLEX NO. 2 SUMMARY OF LEAD DUST WIPE SAMPLES						
Sample Number	Sample Location			Area (inches ²)	Analytical Results (µg/ft ²)	Dust-Lead Hazard Concentration (µg/ft ²)
	Room	Component	Location			
2-1	Entry way	Floor	Near foyer door	144	27.1	40
2-2	Laundry room	Floor	In front of the sink	144	98.2	40
2A1	Unit A, Living room	Window sill	Northwest	144	12.1	250
2A2	Unit A, Living room	Window sill	South	144	<10.0	250
2A3	Unit A, Kitchen	Floor	Near door to front hall	144	<10.0	40
2D1	Unit D, Living room	Floor	Near door to front hall	144	<10.0	40
2D2	Unit D, Kitchen	Floor	Near front hall	144	<10.0	40
2D3	Unit D, Child's Room	Window sill	East wall	144	<10.0	250
2D4	Unit D, Bathroom	Floor	Near south door	144	<10.0	40
µg/ft ² = micrograms per square foot						

Wipe sample results indicate that lead dust levels on the floor in the laundry room was above the acceptable limits for lead dust on floors as set forth in *Guidelines for the Evaluation and Control of Lead-Based Paint Hazards in Housing*, (HUD, 1997 and 2000) and *40 CFR Part 745: Identification of Dangerous Levels of Lead, Final Rule* (Federal Register, January 5, 2001).

Wipe sample results indicate that lead dust levels were within acceptable limits for lead in dust on floors and windowsills in the remaining portions of the building.

3.2.4 Soil-Lead Hazards

As stated previously, no areas of bare soil greater nine square feet were observed in the yard around the building. Consequently, no soil-lead hazards were identified at this site.

3.2.5 Lead-in-Drinking Water Hazards

Maxim collected water samples from Unit D of Apartment Complex No. 2. Sample results are presented in Table 3.4.

TABLE 3.4 APARTMENT COMPLEX NO. 2 SUMMARY OF WATER SAMPLES			
Sample Number	Sample Location	Analytical Results (mg/l)	National Primary Drinking Water Standard (mg/l)
2FD	First Draw, Kitchen Sink, Unit D	<0.003	0.015
2FL	Second Draw, Kitchen Sink Unit D	<0.003	0.015
mg/l = milligrams per liter			

Analysis of the water samples collected in Unit D of Apartment Complex No. 2 indicate that the lead concentration was below the detection limit in both the first draw and second draw samples. Therefore, no lead-in-drinking water hazards were identified on the site during this investigation.

4.0 CONCLUSIONS

Based on the results of this assessment, Maxim concludes the following:

- Thirteen painted building components are covered with lead-based paint, as determined with XRF analysis.
- Two components (window frames and sills) were identified as paint-lead hazards. These components were located throughout Apartment Complex No. 2.
- Five impact surfaces were covered with lead-based paint and have the potential to become paint-lead hazards. However, at the time of the risk assessment, these components were in

fair condition.

- One area (laundry room floor) was identified as a dust-lead hazard.
- No soil-lead hazards were identified.
- No lead-in-drinking water hazards were identified on this site.

5.0 RECOMMENDATIONS

Based on the results of the assessment, Maxim presents the following recommendations:

5.1 Lead-Based Paint

- Landlords are required to distribute the educational information (included in Appendix E) to all building occupants. Standard warning language in leases or sales contract must also include information they need to protect their children from lead-based paint hazards.
- Maxim also recommends that present and future tenants sign for this information documenting receipt of the information for the VA Health Care System.
- A copy of the summary of this report must be provided to new lessees and purchasers of this property (24 CFR Part 35 and 40 CFR Part 745) before they become obligated under a lease or sales contract. The complete report must also be provided to new purchasers and it must be made available to tenants.
- The VA Center should initiate an Operations and Maintenance Plan to monitor the condition of the identified lead-based paint components. Deteriorated lead-based paint components should be assessed for risk.
- Maxim also recommends that the floor of the laundry room be cleaned by wet mopping the floor with a trisodium phosphate detergent at least weekly until a remediation alternative is selected and implemented for painted building components. If the floor or other surfaces in the area are to be vacuumed, only HEPA filtered vacuums should be used to minimize dispersal of air-borne concentrations of lead and re-contamination of the laundry room floor or adjacent areas. With the findings of lead-based paint in the building and the lead dust concentration on the floor of the laundry room, HUD recommends that a reevaluation schedule be developed based on the initial evaluation results and remediation actions taken. We recommend the V.A. Health Care System consider future use of the building to determine what remediation actions are to be taken in the laundry room or in any other areas where lead-based paint was identified.

Costs associated with the above recommendations are presented in Appendix F.

5.2 Risk Assessment

5.2.1 Interim Controls

Preparing and repainting of damaged lead-based painted building components is classified as an interim control measure. Interim controls for friction or impact surfaces include eliminating friction or impact points. However, interim actions are not considered a permanent response in accordance with the guidelines. The following text taken from the HUD Guidelines, Chapter 11, page 11-7, summarizes the management responsibilities of the owner by implementing interim control measures:

"Interim control measures are fully effective only as long as they are carefully monitored, maintained and periodically professionally reevaluated. If interim controls are properly maintained, they can be effective indefinitely. As long as surfaces are covered with lead-based paint, however, they constitute potential hazards. Basic elements include planning, implementation of interim controls, cleanup and clearance, education of residents and maintenance staff, ongoing maintenance and monitoring by the owner, and periodic reevaluation by a certified professional. The term "certified professional" means a certified risk assessor or certified inspector."

The following presents our recommended interim options for the lead-based paint hazards identified during the risk assessment.

Hazard 1: Deteriorated Paint on Window Frames and Window Sills

- Paint stabilization followed by installing window channel guides

Hazard 2: Dust Hazard on Laundry Room Floor

- Dust removal and thorough cleaning of the floor
- Correcting dust-generating conditions

Following completion of the interim measures, on-going monitoring is needed until the components are abated. All interim measures should be conducted in accordance with methods specified in 35 CFR Part 1330.

Costs for the above recommendations are presented in Appendix F.

5.2.2 Abatement

Abatement is designed to permanently eliminate lead-based paint hazards. Abatement of paint-lead hazards must be conducted prior to the sale of any Federally owned property.

Hazard 1: Deteriorated Paint on Window Frames and Window Sills

- Option 1: Building Component Removal
- Option 2: On-site Paint Removal

Hazard 2: Dust Hazard on Laundry Room Floor

- Option 1: Building Component Removal

Costs for the above recommendations are presented in Appendix F.

5.2.3 Total Abatement Option

This option would entail removal and replacement of all lead-based painted components identified. Advantages of this alternative include eliminating all hazards associated with future lead exposure to building occupants and resulting in a "Lead Free" status for the structure. Costs associated with maintenance, periodic inspections and testing are also eliminated. In addition, upgrading exterior envelope items such as doors and windows may result in a long-term savings in increased energy efficiency of the building. Disadvantages of this option include, initial cost associated with the option should be considered with respect to the length of time the Veterans Administration intends to manage or operate the building. Tenants would also need to be relocated during the renovation. This alternative could also be modified to accommodate removal of any previously identified asbestos-containing building material within the building. Installation of replacement materials may also be performed. Costs for the above recommendations are presented in Appendix F.

6.0 LIMITATIONS

This lead inspection and risk assessment report was prepared based field observations and interpretation of XRF readings and laboratory analytical results of samples collected during our site observations. The conclusions of this report are professional opinions based solely upon visual site observations and interpretations of field-testing and interpretations of chemical analysis as described herein.

This report has been prepared to provide information concerning the various types and estimated quantities of lead-based painted building components, lead concentrations in settled dust, soil and water for the structure inspected. It includes only materials and site conditions visible and accessible at the time of our site visit. Permanent building enclosures were not removed or equipment disassembled to determine the presence of lead-based paint. As a result, additional lead-based painted building components may be present in inaccessible areas (e.g., within walls, beneath floors, etc.) of the building.

Because multiple layers of paint may be present on any building component, spatial variations in paint thickness, and since it was not practical to test every building surface, additional lead-containing building materials may be present in the building. Changes in paint color schemes and previous renovation activities may have obscured surfaces containing lead-based paint such that the survey was unable to completely identify or assess the extent of lead-based paint. It should be noted that additional lead-containing components including vent line wrapping, waste line joint sealants, roof flashings, radioactive material of room shielding may be present in the building but were outside the scope of this survey. These additional materials may also be present in inaccessible areas of the building.

This inspection and assessment report is intended to identify and assess lead-based painted building components. It is not intended for use, by a contractor, for the removal or repair of lead-based painted building components.

The opinions and recommendations expressed herein are intended exclusively for use by the Veterans Administration. The scope of services performed by Maxim may not be appropriate to satisfy the needs of other users, and any use or re-use of this document, or the findings presented herein is at the sole risk of the user. The opinions presented herein apply to the site conditions existing at the time of our investigation.

7.0 REFERENCES

Centers for Disease Control and Prevention (CDC), Strategic Plan for the Elimination of Childhood Lead Poisoning, February 1991.

Code of Federal Regulations (CFR), Title 40, Part 745, Lead; Requirements for Lead-Based Paint Activities in Target Housing and Child Occupied Facilities; Final Rule, August 29, 1996, revised January 5, 2001.

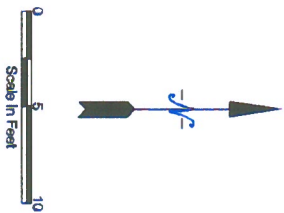
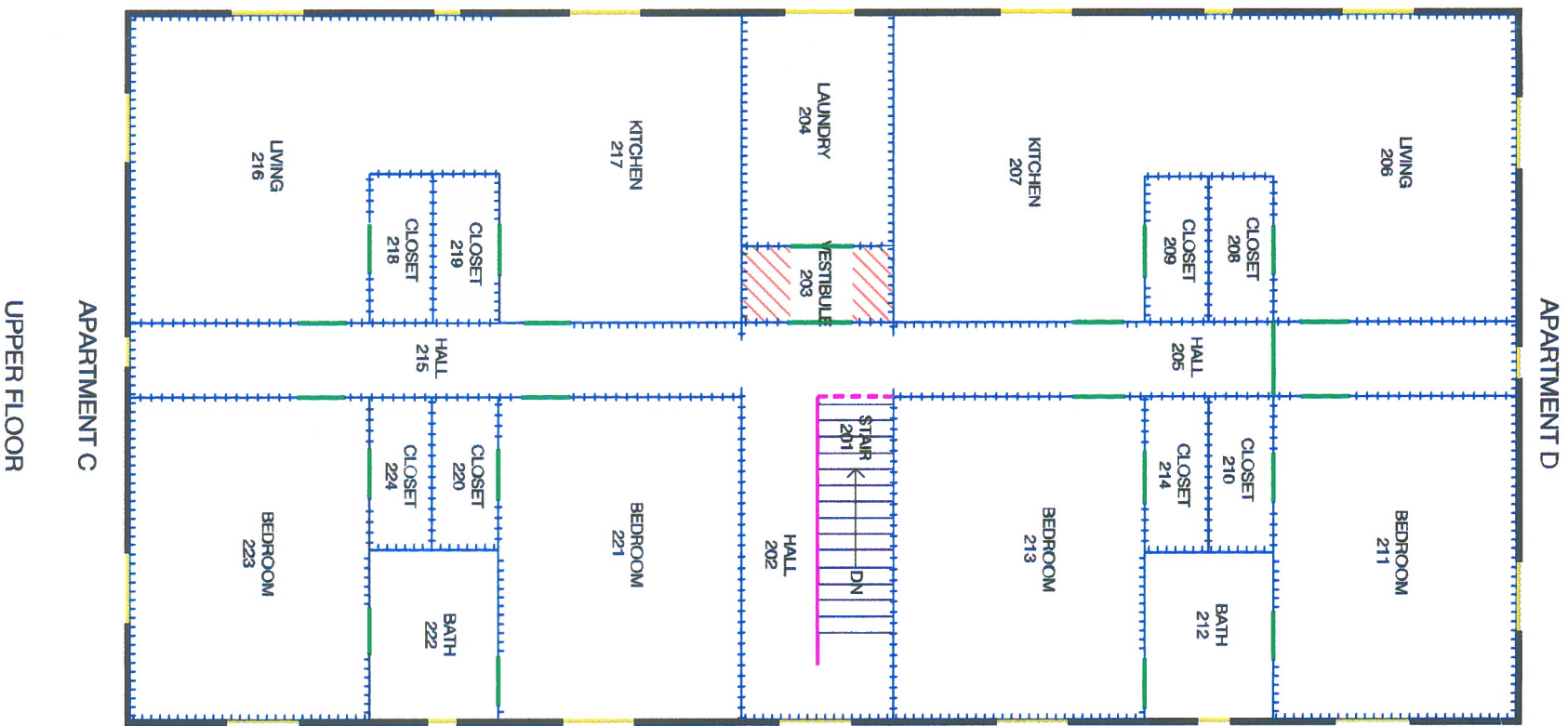
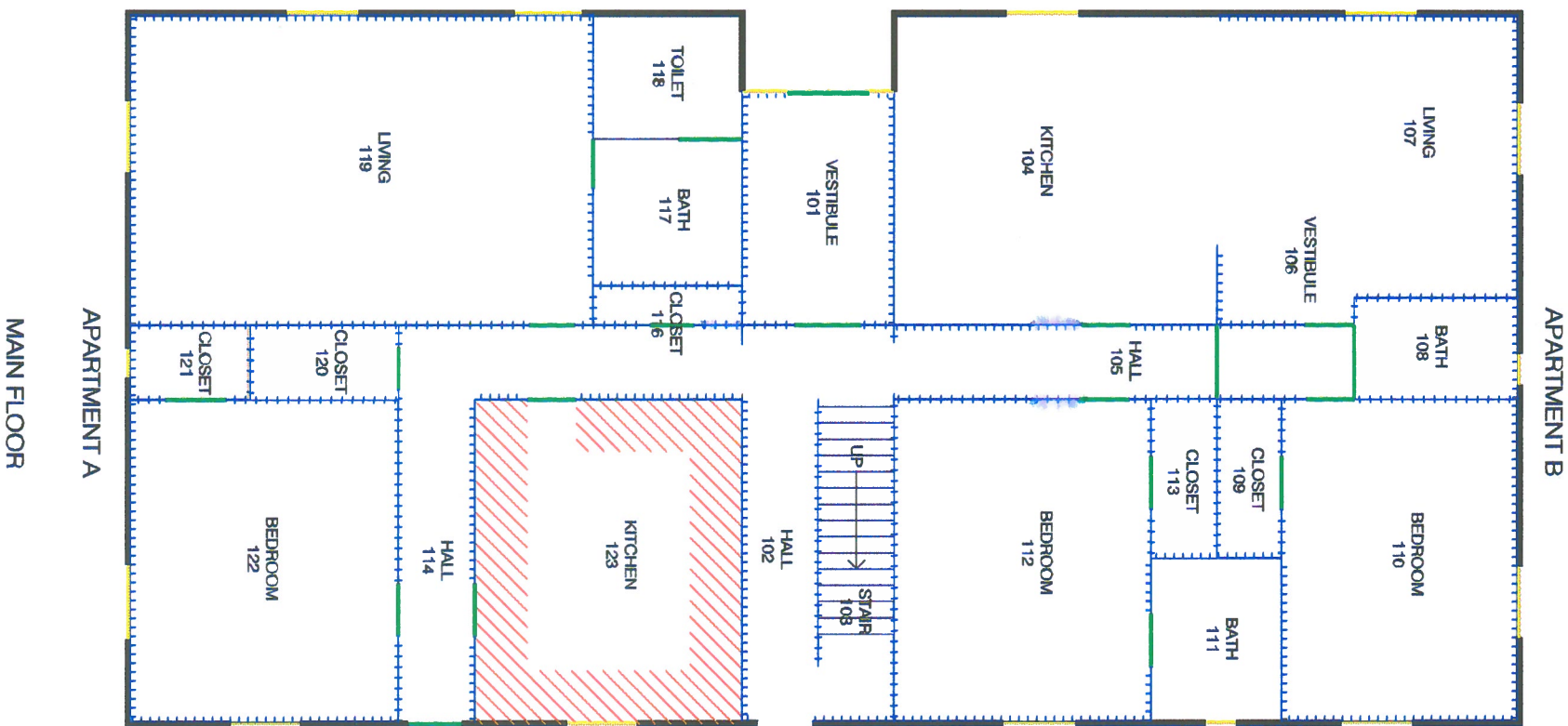
Code of Federal Regulations (CFR), Title 40, Part 141, National Primary Water Regulations, Subpart I - Control of Lead and Copper, revised July 1999.

Code of Federal Regulations (CFR), Title 40, Part 261.24, Resource Conservation and Recovery Act (RCRA) Toxic Characteristic (TC) Disposal of LBP Debris.

Code of Federal Regulations (CFR), Title 24 Part 35 and Title 40, Part 745, Lead; Requirements for Disclosure of Know Lead-Based Paint and/or Lead-Based Paint Hazards in Housing; Final Rule, March 6, 1996.

Housing and Community Development Act, Residential Lead-Based Paint Hazard Reduction Act, Title X, 1992.

Housing and Urban Development (HUD), *Guidelines for the Control of Lead-Based Paint Hazards in Housing*, June 1995, revised 1997 and 2000.



LEGEND

- INTERIOR WOOD DOOR FRAMES
- BASEBOARD
- WOOD WINDOW COMPONENTS
- HAND RAIL
- OVERLOOK RAILING
- CLOSET HOOK PLATE
- CABINET DOORS

LEAD BASED PAINT SURVEY
Apartment Complex Building No.2
VA Medical Center
Miles City, Montana



DRAWN:	WGS	SCALE:	1"=10'	FIGURE NO.	1
REVIEWED:	RWH	DATE:	02/21/2001	PROJECT NO.	2008274

Environmental Training Institute

University of North Dakota
Box 9031, Grand Forks, ND 58202
(701) 777-3341

hereby certifies that

Roger W. Herman, Jr.

Maxim Technologies, Inc.
600 South 25th Street
Billings, MT 59101

has attended and successfully completed the

**Lead Hazard Reduction
Initial Training
for
Risk Assessors**

EPA Accredited Pursuant to
Section 402 of the Toxic Substances Control Act (TSCA) (15C.2582)

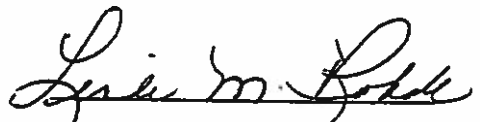
August 26-27, 1999

Course Location: Helena, MT

Exam Date: August 27, 1999

Certification No: LR-00005-0827

Expiration Date: February 27, 2000


Environmental Training Institute

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Billings, MT 59101

has attended and successfully completed the

**Lead Hazard Reduction
Initial Training
for
Inspectors**

EPA Accredited Pursuant to
Section 402 of the Toxic Substances Control Act (TSCA) (15C.2582)

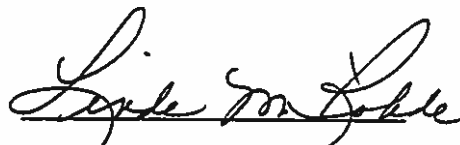
August 23-25, 1999

Course Location: Helena, MT

Exam Date: August 25, 1999

Certification No: LI-00005-0825

Expiration Date: February 25, 2000


Environmental Training Institute

Environmental Training Institute

University of North Dakota

Box 9031, Grand Forks, ND 58202

(701) 777-3341

hereby certifies that

Ryan Behrends

Maxim Technologies, Inc.

618 South 25th Street

Billings, MT 59101

has attended and successfully completed the

LEAD HAZARD REDUCTION TRAINING

INITIAL RISK ASSESSOR COURSE

EPA Accredited Pursuant to

Section 402 of the Toxic Substances Control Act (TSCA) (15C.2682)

and

Approved by the State of Minnesota

Under Minnesota Rules 4761.1030 and under the State of Utah

Administrative Rule R307-840

October 19-20, 2000

Course Location: Grand Forks, ND

Exam Date: October 20, 2000

Certificate # LR-01068-1020

Expiration Date: April 20, 2001


Environmental Training Institute

Environmental Training Institute

University of North Dakota

Box 9031, Grand Forks, ND 58202

(701) 777-3341

hereby certifies that

Ryan Behrends

Maxim Technologies, Inc.

618 South 25th Street

Billings, MT 59101

has attended and successfully completed the

LEAD HAZARD REDUCTION TRAINING

INITIAL INSPECTOR COURSE

EPA Accredited Pursuant to

Section 402 of the Toxic Substances Control Act (TSCA) (15C.2682)

and

Approved by the State of Minnesota

Under Minnesota Rules 4761.1030 and under the State of Utah

Administrative Rule R307-840

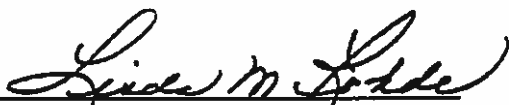
October 16-18, 2000

Course Location: Grand Forks, ND

Exam Date: October 18, 2000

Certificate # LI-01068-1018

Expiration Date: April 18, 2001


Environmental Training Institute



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 8
999 18TH STREET - SUITE 800
DENVER, CO 80202-2488
<http://www.epa.gov/region08>

Ref: 8P-P3T

Certification of Lead-Based Paint Activities Firm (R8F 0029)

Mr. Richard J. Leferink
Maxim Technologies, Inc.
303 Irene Street
Helena MT 59601

Dear Mr. Leferink:

The United States Environmental Agency (EPA), Region 8, has completed its review of the application of Maxim Technologies, Inc., for certification to become a lead-based paint activities firm pursuant to 40 CFR Part 745, Subpart L (61 FR 45778, August 29, 1996). I am pleased to inform you that, as of the date of this letter, Maxim Technologies, Inc. is certified as an EPA Region 8 lead-based paint activities firm.

This firm certification, which expires three years after this date of issuance, is valid only for EPA Region 8, and only in the States of Montana, North Dakota, South Dakota and Wyoming, excluding areas under Indian Tribal jurisdiction in these States.

If any one or more of these EPA-administered States obtains program authorization at any time during the term of your current certification, the scope of your firm certification will be correspondingly diminished to exclude this affected area. Please be aware that your EPA Region 8 certification does not relieve you of any obligations that you may otherwise have to any authorized or unauthorized State or Indian Tribe to obtain licensure or certification from that State or Indian Tribe under its statutory or regulatory requirements relating to lead-based paint activities.

Your EPA Region 8 firm certification is subject to the following restrictions:

- 1) Certification pertains only to firms which perform or offer to perform any of the lead-based paint activities described in §745.227 of Subpart L pursuant to Section 402 of the Toxic Substances Control Act (TSCA) (15 U.S.C. 2682). The certification does not encompass lead-based paint activities in sections of Subpart L other than §745.227.

2) EPA Region 8 certification does not mean that a State or Indian Tribe with its own certification program must accept or recognize an EPA Region 8 certification. Individual States and Indian Tribes, whether authorized or not, have the right to accept or reject any certification under their own authority.

3) EPA Region 8 certification is specific and limited to the jurisdictions described above. If you wish to obtain certifications in other EPA administered State or Indian Tribal jurisdictions, you will need to apply separately for these certifications.

4) In advertising the EPA Region 8 certification, firms must indicate clearly that the firm is only certified under Section 402 of TSCA. Failure to accurately state EPA Region 8 certification conditions in advertisements could result in EPA Region 8 suspending or withdrawing certification.

5) EPA Region 8 may revoke or suspend its certification of any firm if subsequent alterations or deviations result in the firm no longer meeting the standards found at 40 CFR Part 745, Subpart L.

6) EPA Region 8 may conduct audits and/or inspections to ensure continued compliance with EPA regulatory standards. You may use a copy of this letter as proof of your EPA Region 8 certification until receipt of your certification certificates for the jurisdictions described above. These will be issued under separate cover. Upon receipt of the certification certificates, you are required to have the appropriate original certificate, or a clean, legible copy of the original certificate, for the appropriate jurisdiction immediately available at the worksite when you are performing the lead-based paint activities. We suggest you retain the original certificates at your primary place of business as part of your firm's records maintenance activities, providing copies at lead-based paint activities worksites.

Please submit any future notifications or correspondence with this office, preferably referring to the certification tracking number (R8F 0029), to the following address:

Regional Lead Coordinator
EPA Region 8 (8P-P3T)
999 18th Street - Suite 500
Denver, CO 80202-2466

If you have questions or need assistance please contact Mr. Vern Dander at 303 312-6032. Thank you for your interest in providing certified lead-based paint activities services in EPA Region 8.

Sincerely,



Judith Wong, Director
Pollution Prevention, Pesticides,
and Toxics Program

cc: HQ, T. Brown
OPTIMUS, NLSC
Region 8, 8ENF-T
Region 10
File

EXPLANATION OF XRF TEST HEADINGS

The Niton XL XRF is capable of detecting lead concentrations of less than 1.0 mg/cm² through multiple layers of paint. Niton indicates accuracy of the Niton XL XRF to be plus or minus 0.15 mg/cm² for surface lead; plus or minus 0.2 mg/cm² for buried lead; and plus or minus 0.3 mg/cm² for deeply buried lead, for all substrates at a 95% confidence level. The Niton XL displays readings and ancillary information useful for classification purposes. An algorithm indicated by the HUD/EPA-issued *XRF Performance Characteristic Sheet* for classifying results is first applied to 20-second L-shell readings followed by 120-second nominal K-shell readings to resolve inconclusive results and then paint chip samples are to be collected if necessary. The *Performance Characteristic Sheet* for the Niton XL XRF is located in this appendix.

The **Test No.** refers to the XRF numbering assignment for the reading being collected.

The **Room No.** refers to the number assigned to the discrete area within the building.

The **Location/Description** refers to the present use of the room or area. In addition, the surface tested is also described in this section. Walls are identified for testing using the methodologies outline in the HUD standards. Upon entering a room the wall to the right of the entry is labeled A with all subsequent walls B, C and D are coded counter-clockwise from wall A.

The **Component** further describes the item or surface being tested, such as a window, wall, handrail, etc...

The **Substrate** heading tells what the painted structure or feature tested is made of.

The **Present Color** heading refers to the color of the painted surface at the time it was tested.

The **Condition** heading refers to the condition of the paint. Solid, intact, cracked, peeling or chalky are terms typically used to describe the condition of the paint.

The **Concentration in (mg/cm²)** is the XRF measurement of the concentration (milligrams) of lead per square centimeter (cm²) of a painted surface. According to the HUD Guidelines, the level of lead in paint or other coating which materially endangers the health of children by producing a substantial and serious danger of lead poisoning is a measurement of 1.0 mg/cm² or greater as measured by X-Ray Florescence (XRF).

The **Lead (+ or -)** column indicates if lead was detected in concentrations greater than the standard (+) or below the standard (-).

XRF TEST RESULTS
APARTMENT COMPLEX NO. 2
EXTERIOR AND COMMON AREAS
VA MONTANA HEALTHCARE SYSTEM
MILES CITY, MONTANA
NITON XL #309-U638NR154

Test No.	Room No.	Location/Description	Component	Substrate	Present Color	Condition	Concentration mg/cm ²	Lead (+ or -)
1	NA	Calibration	NA	NA	NA	NA	<0.1	-
2	NA	Calibration	NA	NA	NA	NA	0.3	-
3	NA	Calibration	NA	NA	NA	NA	3.6	+
4	NA	Calibration	NA	NA	NA	NA	1.0	+
5	Ext.	Numbers on steps	Steps	Concrete	White	Intact	<0.1	-
6	Ext.	Numbers on steps	Steps	Concrete	White	Intact	<0.1	-
7	Ext.	Columns on front	Column	Wood	White	Fair	>5.0	+
8	Ext.	South column	Sign	Wood	White	Fair	1.8	+
9	Ext.	Around front door	Window frame	Wood	White	Intact	>5.0	+
10	Ext.	Front	Screen door	Metal	White	Intact	<0.1	-
11	Ext.	Front	Front door	Wood	White	Intact	>5.0	+
12	101	Vestibule	Heater	Metal	White	Intact	<0.1	-
13	101	Vestibule, Wall A	Wall	Plaster	White	Intact	<0.1	-
14	101	Vestibule, Wall B	Wall	Wood	White	Intact	<0.1	-
15	101	Vestibule, Wall B	Door frame	Metal	White	Intact	<0.1	-
16	101	Vestibule, Wall B	Door	Metal	White	Intact	NA	Inconclusive
17	101	Vestibule, Wall B	Door	Metal	White	Intact	0.2	-
18	101	Vestibule, Wall C	Wall	Wood	White	Intact	<0.1	-
19	101	Vestibule, Wall C	Fire extinguisher box	Metal	White	Intact	<0.1	-
20	101	Vestibule, Wall D	Window frame	Wood	White	Intact	2.2	+
21	101	Vestibule, Wall D	Wall	Plaster	White	Intact	<0.1	-
22	102	Hall, Wall A	Wall	Plaster	White	Intact	<0.1	-
23	102	Hall, Wall C	Wall	Plaster	White	Intact	<0.1	-
24	102	Hall, Wall C	Fuse box	Metal	White	Intact	<0.1	-
25	102	Hall, Wall C	Heater	Metal	White	Fair	0.2	-

XRF TEST RESULTS
APARTMENT COMPLEX NO. 2
EXTERIOR AND COMMON AREAS
VA MONTANA HEALTHCARE SYSTEM
MILES CITY, MONTANA
NITON XL #309-U638NR154

Test No.	Room No.	Location/Description	Component	Substrate	Present Color	Condition	Concentration mg/cm ²	Lead (+ or -)
26	102	Hall, Wall B	Wall	Plaster	White	Intact	<0.1	-
27	102	Hall, Wall B	Door	Wood	White	Intact	<0.1	-
28	102	Hall, Wall B	Door frame	Wood	White	Intact	4.2	+
29	102	Hall, Wall A	Door	Metal	White	Intact	0.4	-
30	102	Hall, Wall A	Door frame	Metal	White	Intact	0.3	-
31	102	Hall, Wall D	Door frame	Metal	White	Intact	0.3	-
32	102	Hall, Wall D	Wall	Plaster	White	Intact	<0.1	-
33	102	Hall, Wall D	Electrical tube	Metal	White	Intact	<0.1	-
34	102	Hall, Wall D	Door	Metal	White	Intact	0.3	-
35	101	Vestibule, Back of front door	Door	Wood	White	Intact	<0.1	-
36	103	Stair, Wall A	Wall	Wood	White	Intact	<0.1	-
37	103	Stair, Wall C	Wall	Plaster	White	Intact	<0.1	-
38	201	Stair, Wall B	Wall	Plaster	White	Intact	<0.1	-
39	201	Stair, Wall B	Heater	Metal	White	Intact	0.3	-
40	201	Stair, Wall B	Window sill	Wood	White	Fair	1.8	+
41	201	Stair, Wall B	Window frame	Metal	White	Intact	<0.1	-
42	201	Stair, Wall B	Window sill	Wood	White	Fair	1.8	+
43	201	Stair, Wall B	Window frame	Wood	White	Fair	1.2	+
44	202	Hall, Wall C	Wall	Plaster	White	Intact	<0.1	-
45	202	Hall, Wall A	Wall	Plaster	White	Intact	<0.1	-
46	202	Hall, Wall A	Rail cup	Wood	White	Fair	1.2	+
47	202	Hall, Wall D	Wall	Plaster	White	Intact	<0.1	-
48	202	Hall, Wall D	Door frame	Metal	White	Intact	0.2	-
49	202	Hall, Wall D	Door	Metal	White	Intact	0.3	-
50	202	Center	Metal rail	Metal	White	Fair	>5.0	+

XRF TEST RESULTS
APARTMENT COMPLEX NO. 2
EXTERIOR AND COMMON AREAS
VA MONTANA HEALTHCARE SYSTEM
MILES CITY, MONTANA
NITON XL #309-U638NR154

Test No.	Room No.	Location/Description	Component	Substrate	Present Color	Condition	Concentration mg/cm ²	Lead (+ or -)
51	202	Hall, Wall C	Fire extinguisher box	Metal	White	Intact	<0.1	-
52	203	Vestibule, Wall A	Wall	Plaster	White	Intact	<0.1	-
53	203	Vestibule, Wall A	Cabinet door	Wood	White	Fair	1.6	+
54	203	Vestibule, Wall B	Wall	Plaster	White	Fair	0.2	-
55	203	Vestibule, Wall B	Door frame	Metal	White	Fair	0.3	-
56	203	Vestibule, Wall B	Door	Metal	White	Fair	0.4	-
57	203	Vestibule, Wall C	Wall	Plaster	White	Intact	<0.1	-
58	203	Vestibule, Wall C	Cabinet door	Wood	White	Fair	2.2	+
59	203	Vestibule, Wall D	Wall	Wood	White	Intact	<0.1	-
60	203	Vestibule, Wall D	Door frame	Wood	White	Fair	1.7	+
61	204	Laundry, Wall B	Wall	Wood	White	Fair	<0.1	-
62	204	Laundry, Wall	Wall	Wood	White	Fair	<0.1	-
63	204	Laundry, Wall D	Wall	Plaster	White	Poor	<0.1	-
64	204	Laundry, Wall D	Window sill	Wood	White	Poor	1.7	+
65	204	Laundry, Wall D	Heater	Metal	White	Fair	0.5	-
66	204	Laundry, Center	Floor	Concrete	White	Poor	<0.1	-
67	204	Laundry, Center	Ceiling	Wood	White	Poor	<0.1	-
68	NA	Calibration	NA	NA	NA	NA	<0.1	-
69	NA	Calibration	NA	NA	NA	NA	3.7	+
70	204	Laundry, Wall C	Wall	Plaster	White	Fair	0.2	-
71	204	Laundry, Wall C	Shelf	Wood	White	Intact	<0.1	-
72	204	Laundry, Wall C	Water pipe	Metal	White	Fair	<0.1	-
73	204	Laundry, Wall C	Drain pipe	Metal	White	Poor	NA	Inconclusive
74	204	Laundry, Wall C	Drain pipe	Metal	White	Poor	<0.1	-
75	204	Laundry, Wall A	Electrical	Metal	White	Fair	0.3	-

XRF TEST RESULTS
APARTMENT COMPLEX NO. 2
EXTERIOR AND COMMON AREAS
VA MONTANA HEALTHCARE SYSTEM
MILES CITY, MONTANA
NITON XL #309-U638NR154

Test No.	Room No.	Location/Description	Component	Substrate	Present Color	Condition	Concentration mg/cm ²	Lead (+ or -)
76	204	Laundry, Wall A	Shelf	Wood	White	Fair	<0.1	-
77	204	Laundry, Wall D	Window frame	Wood	White	Poor	2.1	+
78	204	Laundry, Wall D	Window frame	Metal	White	Intact	<0.1	-
79	203	Vestibule, center	Ceiling	Plaster	White	Intact	0.2	-
80	202	Hall, center	Ceiling	Plaster	White	Intact	<0.1	-
81	202	Hall, Wall A	Door frame	Metal	White	Intact	0.2	-
82	202	Hall, Wall A	Door	Metal	White	Intact	0.5	-
83	202	Hall, Wall C	Door frame	Metal	White	Intact	0.2	-
84	202	Hall, Wall C	Door	Metal	White	Intact	0.8	-
85	102	Hall, center	Ceiling	Wood	White	Intact	0.2	-
86	101	Vestibule, center	Ceiling	Wood	White	Intact	<0.1	-

XRF TEST RESULTS
APARTMENT COMPLEX NO. 2
APARTMENT B
VA MONTANA HEALTHCARE SYSTEM
MILES CITY, MONTANA
NITON XL #309-U638NR154

Test No.	Room No.	Location/Description	Component	Substrate	Present Color	Condition	Concentration mg/cm ²	Lead (+ or -)
87	105	Hall, Wall A	Wall	Plaster	White	Intact	0.2	-
88	105	Hall, Wall A	Door frame	Wood	White	Intact	1.4	+
89	105	Hall, Wall D	Wall	Plaster	White	Intact	<0.1	-
90	105	Hall, Wall D	Door frame	Wood	White	Intact	1.2	+
91	105	Hall, Wall D	Door frame	Wood	White	Intact	2.2	+
92	105	Hall, Wall B	Wall	Plaster	White	Intact	<0.1	-
93	105	Hall, Wall B	Door frame	Wood	White	Intact	1.3	+
94	105	Hall, Wall C	Wall	Plaster	NA	Intact	<0.1	-
95	105	Hall, Wall C	Door	Metal	NA	NA	NA	Inconclusive
96	105	Hall, Wall C	Door	Metal	White	NA	NA	Inconclusive
97	105	Hall, Wall C	Door	Metal	White	Intact	0.5	-
98	105	Hall, Wall C	Door frame	Metal	White	Fair	0.3	-
99	105	Hall, center	Ceiling	Plaster	White	Intact	NA	Inconclusive
100	105	Hall, center	Ceiling	Plaster	White	Intact	<0.1	-
101	112	Bedroom, Wall A	Wall	Plaster	White	Intact	<0.1	-
102	112	Bedroom, Wall B	Wall	Plaster	White	Intact	<0.1	-
103	112	Bedroom, Wall B	Window sill	Wood	White	Intact	2.0	+
104	112	Bedroom, Wall C	Wall	Plaster	White	Intact	<0.1	-
105	112	Bedroom, Wall D	Wall	Plaster	White	Intact	<0.1	-
106	112	Bedroom, Wall A	Closet door	Wood	White	Intact	<0.1	-
107	112	Bedroom, Wall A	Bathroom door	Wood	White	Intact	<0.1	-
108	112	Bedroom, Wall A	Door frame	Wood	White	Intact	1.3	+
109	112	Bedroom, center	Ceiling	Plaster	White	Intact	NA	Inconclusive
110	112	Bedroom, center	Ceiling	Plaster	White	Intact	<0.1	-
111	111	Bathroom, Wall A	Wall	Plaster	White	Intact	<0.1	-
112	111	Bathroom, Wall B	Wall	Plaster	White	Intact	<0.1	-

XRF TEST RESULTS
APARTMENT COMPLEX NO. 2
APARTMENT B
VA MONTANA HEALTHCARE SYSTEM
MILES CITY, MONTANA
NITON XL #309-U638NR154

Test No.	Room No.	Location/Description	Component	Substrate	Present Color	Condition	Concentration mg/cm ²	Lead (+ or -)
113	111	Bathroom, Wall C	Wall	Plaster	White	Intact	<0.1	-
114	111	Bathroom, Wall C	Door	Wood	White	Intact	<0.1	-
115	111	Bathroom, Wall D	Wall	Plaster	White	Intact	<0.1	-
116	111	Bathroom, Wall B	Window sill	Wood	White	Fair	NA	Inconclusive
117	111	Bathroom, Wall B	Window sill	Wood	White	Fair	1.8	+
118	111	Bathroom, Wall B	Window frame	Wood	White	Fair	1.6	+
119	111	Bathroom, Center	Ceiling	Plaster	White	Intact	<0.1	-
120	113	Bedroom, Wall A	Wall	Plaster	White	Intact	0.2	-
121	113	Bedroom, Wall C	Door	Wood	White	Intact	<0.1	-
122	113	Bedroom, Wall C	Door frame	Wood	White	Intact	1.8	+
123	104	Kitchen, Wall B	Wall	Plaster	White	Intact	<0.1	-
124	104	Kitchen, Wall C	Wall	Plaster	White	Intact	<0.1	-
125	104	Kitchen, Wall D	Wall	Plaster	White	Intact	<0.1	-
126	104	Kitchen, Wall D	Window sill	Wood	White	Intact	1.7	+
127	104	Kitchen, Wall D	Window frame	Wood	White	Intact	1.6	+
128	104	Kitchen, Wall D	Window frame	Metal	White	Intact	<0.1	-
129	104	Kitchen, Wall A	Wall	Plaster	White	Intact	<0.1	-
130	106	Vestibule, Wall C	Wall	Plaster	White	Intact	<0.1	-
131	106	Vestibule, Wall B	Wall	Plaster	White	Intact	<0.1	-
132	106	Vestibule, Wall A	Wall	Plaster	White	Intact	NA	Inconclusive
133	106	Vestibule, Wall A	Wall	Plaster	White	Intact	<0.1	-
134	107	Living, Wall B	Wall	Plaster	White	Intact	<0.1	-
135	107	Living, Wall A	Wall	Plaster	White	Intact	<0.1	-

XRF TEST RESULTS
APARTMENT COMPLEX NO. 2
APARTMENT B
VA MONTANA HEALTHCARE SYSTEM
MILES CITY, MONTANA
NITON XL #309-U638NR154

Test No.	Room No.	Location/Description	Component	Substrate	Present Color	Condition	Concentration mg/cm ²	Lead (+ or -)
136	107	Living, Wall D	Wall	Plaster	White	Intact	<0.1	-
137	107	Living, Wall A	Window sill	Wood	White	Intact	NA	Inconclusive
138	107	Living, Wall A	Window sill	Wood	White	Intact	1.1	+
139	110	Bedroom, Wall A	Window sill	Wood	White	Intact	1.2	+
140	110	Bedroom, Wall A	Wall	Plaster	White	Intact	<0.1	-
141	110	Bedroom, Wall D	Wall	Plaster	White	Intact	<0.1	-
142	110	Bedroom, Wall C	Wall	Plaster	White	Intact	0.2	-
143	110	Bedroom, Wall B	Wall	Plaster	White	Intact	<0.1	-
144	110	Bedroom, Wall B	Window sill	Wood	White	Intact	1.3	+
145	110	Bedroom, Wall B	Heater	Metal	White	Intact	0.5	-
146	110	Bedroom, Wall C	Closet door	Wood	White	Intact	<0.1	-
147	110	Bedroom, center	Ceiling	Plaster	White	Intact	<0.1	-
148	NA	Calibration	NA	NA	NA	NA	<0.1	-
149	NA	Calibration	NA	NA	NA	NA	2.9	+
150	NA	Calibration	NA	NA	NA	NA	0.3	-

XRF TEST RESULTS
APARTMENT COMPLEX NO. 2
APARTMENT A
VA MONTANA HEALTHCARE SYSTEM
MILES CITY, MONTANA
NITON XL #309-U638NR154

Test No.	Room No.	Location/Description	Component	Substrate	Present Color	Condition	Concentration mg/cm ²	Lead (+ or -)
151	115	Hall, Wall A	Wall	Plaster	White	Intact	<0.1	-
152	115	Hall, Wall A	Door	Metal	White	Fair	0.5	-
153	115	Hall, Wall A	Door frame	Metal	White	Fair	<0.1	-
154	115	Hall, Wall A	Door	Metal	White	Fair	0.4	-
155	115	Hall, Wall B	Wall	Plaster	White	Intact	<0.1	-
156	115	Hall, Wall B	Door frame	Wood	White	Fair	1.8	+
157	115	Hall, Wall C	Wall	Plaster	White	Fair	<0.1	-
158	115	Hall, Wall C	Door	Wood	White	Intact	<0.1	-
159	115	Hall, Wall D	Wall	Plaster	White	Intact	<0.1	-
160	115	Hall, Wall D	Door	Varnish	Wood	Intact	<0.1	-
161	115	Hall, Wall D	Door frame	Wood	White	Fair	1.9	+
162	119	Living, Wall A	Wall	Plaster	White	Intact	<0.1	-
163	119	Living, Wall D	Window sill	Wood	White	Fair	1.9	+
164	119	Living, Wall D	Wall	Plaster	White	Intact	<0.1	-
165	119	Living, Wall D	Base heater	Metal	White	Poor	<0.1	-
166	119	Living, Wall C	Wall	Plaster	White	Fair	<0.1	-
167	119	Living, Wall C	Window sill	Wood	White	Intact	1.9	+
168	119	Living, Wall B	Wall	Plaster	White	Fair	<0.1	-
169	117	Bathroom, Wall A	Wall	Plaster	White	Fair	<0.1	-
170	117	Bathroom, Wall B	Wall	Plaster	White	Fair	<0.1	-
171	117	Bathroom, Wall A	Baseboard	Wood	White	Fair	2.0	+
172	117	Bathroom, Wall D	Wall	Plaster	White	Fair	0.2	-
173	117	Bathroom, Wall D	Door	Varnish	Wood	Intact	<0.1	-
174	117	Bathroom, Wall D	Door frame	Wood	White	Fair	1.7	+
175	117	Bathroom, Wall C	Wall	Plaster	White	Fair	<0.1	-

XRF TEST RESULTS
APARTMENT COMPLEX NO. 2
APARTMENT A
VA MONTANA HEALTHCARE SYSTEM
MILES CITY, MONTANA
NITON XL #309-U638NR154

Test No.	Room No.	Location/Description	Component	Substrate	Present Color	Condition	Concentration mg/cm ²	Lead (+ or -)
176	117	Bathroom, Wall C	Door frame	Wood	White	Fair	1.6	+
177	117	Bathroom, Wall C	Door	Wood	Varnish	Intact	<0.1	-
178	118	Toilet, Wall A	Wall	Plaster	White	Intact	<0.1	-
179	118	Toilet, Wall A	Window sill	Wood	White	Fair	2.0	+
180	118	Toilet, Wall a	Heater	Metal	White	Fair	0.3	-
181	118	Toilet, Wall B	Wall	Plaster	White	Intact	<0.1	-
182	118	Toilet, Wall B	Door	Wood	White	Intact	<0.1	-
183	118	Toilet, Wall C	Wall	Plaster	White	Intact	<0.1	-
184	118	Toilet, Wall C	Cabinet	Wood	Stain	Intact	<0.1	-
185	118	Toilet, Wall D	Wall	Plaster	White	Fair	<0.1	-
186	118	Toilet, center	Ceiling	Plaster	White	Intact	<0.1	-
187	117	Bathroom, center	Ceiling	Plaster	White	Fair	<0.1	-
188	123	Kitchen, center	Ceiling	Plaster	White	Fair	<0.1	-
189	123	Kitchen, Wall a	Wall	Plaster	White	Fair	0.2	-
190	123	Kitchen, Wall A	Cabinet door	Wood	White	Fair	1.5	+
191	123	Kitchen, Wall A	Cabinet door	Wood	White	Fair	1.6	+
192	123	Kitchen, Wall B	Wall	Plaster	White	Fair	<0.1	-
193	123	Kitchen, Wall B	Heat vent	Metal	White	Intact	0.2	-
194	123	Kitchen, Wall B	Window sill	Wood	White	Fair	1.6	+
195	123	Kitchen, Wall C	Wall	Plaster	White	Fair	<0.1	-
196	123	Kitchen, Wall C	Door	Wood	White	Fair	<0.1	-
197	123	Kitchen, Wall C	Door frame	Wood	White	Fair	2.1	+
198	123	Kitchen, Wall C	Cabinet door	Wood	White	Fair	1.5	+
199	123	Kitchen, Wall C	Cabinet door	Wood	Fur	Fair	1.5	+
200	114	Hall, Wall A	Wall	Plaster	White	Fair	0.2	-

XRF TEST RESULTS
APARTMENT COMPLEX NO. 2
APARTMENT A
VA MONTANA HEALTHCARE SYSTEM
MILES CITY, MONTANA
NITON XL #309-U638NR154

Test No.	Room No.	Location/Description	Component	Substrate	Present Color	Condition	Concentration mg/cm ²	Lead (+ or -)
201	114	Hall, Wall B	Wall	Plaster	White	Fair	0.2	-
202	114	Hall, Wall C	Wall	Plaster	White	Fair	<0.1	-
203	114	Hall, Wall C	Door	Wood	Varnish	Intact	<0.1	-
204	114	Hall, Wall C	Door frame	Wood	White	Fair	2.1	+
205	122	Bedroom, Wall B	Window Sill	Wood	White	Fair	2.3	+
206	122	Bedroom, Wall B	Wall	Plaster	White	Intact	<0.1	-
207	122	Bedroom, Wall C	Wall	Plaster	White	Fair	0.2	-
208	122	Bedroom, Wall C	Door	Wood	White	Intact	1.3	+
209	122	Bedroom, Wall D	Wall	Plaster	White	Intact	0.4	-
210	122	Bedroom, Wall A	Wall	Plaster	White	Intact	0.2	-
211	122	Bedroom, Wall D	Closet door	Wood	Varnish	Intact	<0.1	-
212	122	Bedroom, Wall C	Window frame	Wood	White	Poor	1.4	+
213	121	Closet, Wall A	Wall	Plaster	White	Intact	0.3	-
214	121	Closet, Wall A	Screw board	Wood	White	Intact	2.0	+
215	121	Closet, Wall D	Wall	Plaster	White	Intact	0.3	-
216	121	Closet, Wall C	Window sill	Wood	White	Intact	2.0	+

XRF TEST RESULTS
APARTMENT COMPLEX NO. 2
APARTMENT D
VA MONTANA HEALTHCARE SYSTEM
MILES CITY, MONTANA
NITON XL #309-U638NR154

Test No.	Room No.	Location/Description	Component	Substrate	Present Color	Condition	Concentration mg/cm ²	Lead (+ or -)
217	205	Hall, Wall A	Wall	Plaster	White	Intact	<0.1	-
218	205	Hall, Wall A	Door	Metal	White	Fair	0.3	-
219	205	Hall, Wall A	Door frame	Metal	White	Fair	<0.1	-
220	205	Hall, Wall A	Door	Metal	White	Fair	0.4	-
221	205	Hall, Wall B	Wall	Plaster	White	Intact	<0.1	-
222	205	Hall, Wall B	Door frame	Wood	White	Fair	2.1	+
223	205	Hall, Wall C	Wall	Plaster	White	Fair	<0.1	-
224	205	Hall, Wall C	Door	Wood	White	Intact	<0.1	-
225	205	Hall, Wall D	Wall	Plaster	White	Intact	<0.1	-
226	205	Hall, Wall D	Door	Varnish	Wood	Intact	<0.1	-
227	205	Hall, Wall D	Door frame	Wood	White	Fair	1.6	+
228	206	Living, Wall A	Wall	Plaster	White	Intact	<0.1	-
229	206	Living, Wall D	Window sill	Wood	White	Fair	1.8	+
230	206	Living, Wall D	Wall	Plaster	White	Intact	<0.1	-
231	206	Living, Wall D	Base heater	Metal	White	Poor	<0.1	-
232	206	Living, Wall C	Wall	Plaster	White	Fair	<0.1	-
233	206	Living, Wall C	Window sill	Wood	White	Intact	2.0	+
234	206	Living, Wall B	Wall	Plaster	White	Fair	<0.1	-
235	207	Kitchen, Center	Ceiling	Plaster	White	Fair	<0.1	-
236	207	Kitchen, Wall A	Wall	Plaster	White	Fair	0.2	-
237	207	Kitchen, Wall B	Wall	Plaster	White	Fair	<0.1	-
238	207	Kitchen, Wall B	Heat vent	Metal	White	Intact	0.2	-
239	207	Kitchen, Wall B	Window sill	Wood	White	Fair	1.9	+
240	207	Kitchen, Wall C	Wall	Plaster	White	Fair	<0.1	-
241	207	Kitchen, Wall D	Door	Wood	White	Fair	<0.1	-

XRF TEST RESULTS
APARTMENT COMPLEX NO. 2
APARTMENT D
VA MONTANA HEALTHCARE SYSTEM
MILES CITY, MONTANA
NITON XL #309-U638NR154

Test No.	Room No.	Location/Description	Component	Substrate	Present Color	Condition	Concentration mg/cm ²	Lead (+ or -)
242	207	Kitchen, Wall D	Door frame	Wood	White	Fair	2.6	+
243	205	Hall, Wall A	Wall	Plaster	White	Fair	0.2	-
244	213	Bedroom, Wall B	Window Sill	Wood	White	Fair	2.6	+
245	213	Bedroom, Wall B	Wall	Plaster	White	Intact	<0.1	-
246	213	Bedroom, Wall C	Wall	Plaster	White	Fair	0.5	-
247	213	Bedroom, Wall A	Door	Wood	White	Intact	1.1	+
248	213	Bedroom, Wall A	Door frame	Wood	White	Fair	3.1	+
249	213	Bedroom, Wall D	Wall	Plaster	White	Intact	0.3	-
250	213	Bedroom, Wall A	Wall	Plaster	White	Intact	0.3	-
251	213	Bedroom, Wall A	Closet door	Wood	Varnish	Intact	<0.1	-
252	213	Bedroom, Wall D	Door	Wood	Varnish	Intact	0.0	-
253	213	Bedroom, Wall D	Door frame	Wood	White	Fair	2.8	+
254	214	Closet, Wall A	Wall	Plaster	White	Intact	0.1	-
255	214	Closet, Wall D	Wall	Plaster	White	Intact	0.4	-
256	213	Closet, Wall C	Door	Wood	White	Intact	1.6	+
257	213	Closet, Wall C	Door frame	Wood	White	Fair	2.1	+
258	212	Bathroom, Wall A	Wall	Plaster	White	Fair	<0.1	-
259	212	Bathroom, Wall B	Wall	Plaster	White	Fair	<0.1	-
260	212	Bathroom, Wall A	Baseboard	Wood	White	Fair	2.2	+
261	212	Bathroom, Wall D	Wall	Plaster	White	Fair	0.1	-
262	212	Bathroom, Wall D	Door	Varnish	Wood	Intact	<0.1	-
263	212	Bathroom, Wall A	Door frame	Wood	White	Fair	1.9	+
264	212	Bathroom, Wall C	Wall	Plaster	White	Fair	<0.1	-
265	212	Bathroom, Wall D	Door frame	Wood	White	Fair	1.6	+
266	212	Bathroom, Wall D	Door	Wood	Varnish	Intact	<0.1	-
267	212	Bathroom, center	Ceiling	Plaster	White	Fair	<0.1	-
268	211	Bedroom, Wall B	Window Sill	Wood	White	Fair	2.9	+

XRF TEST RESULTS
APARTMENT COMPLEX NO. 2
APARTMENT D
VA MONTANA HEALTHCARE SYSTEM
MILES CITY, MONTANA
NITON XL #309-U638NR154

Test No.	Room No.	Location/Description	Component	Substrate	Present Color	Condition	Concentration mg/cm ²	Lead (+ or -)
269	211	Bedroom, Wall B	Wall	Plaster	White	Intact	<0.1	-
270	211	Bedroom, Wall C	Wall	Plaster	White	Fair	0.5	-
271	211	Bedroom, Wall C	Door	Wood	White	Intact	1.1	+
272	211	Bedroom, Wall C	Door frame	Wood	White	Fair	3.1	+
273	211	Bedroom, Wall D	Wall	Plaster	White	Intact	0.3	-
274	211	Bedroom, Wall A	Wall	Plaster	White	Intact	0.3	-
275	211	Bedroom, Wall C	Closet door	Wood	Varnish	Intact	<0.1	-
277	211	Bedroom, Wall C	Door frame	Wood	White	Fair	2.8	+
278	210	Closet, Wall C	Wall	Plaster	White	Intact	0.1	-
279	210	Closet, Wall D	Wall	Plaster	White	Intact	0.4	-
280	210	Closet, Wall A	Door	Wood	White	Intact	1.6	+
281	210	Closet, Wall A	Door frame	Wood	White	Fair	2.1	+

Bldg 2 Apt A

Facility Questionnaire

(To be completed by occupant)

Children/Children's Habits

1. (a) Do you have any children that live in your home?

Yes X No

(If no children, skip to question 5.)

- (b) If yes, how many? 1

Ages? 11 months

- (c) Record blood lead levels, if known.

- (d) Are there women of child-bearing age present?

Yes X No

2. Location of the rooms/areas where each child sleeps, eats, plays.

Name of child	Location of bedroom	Location of all rooms where child eats	Primary location where child plays indoors	Primary location where child plays outdoors
Wyatt	main	Kitchen, living room	living room	—

3. Where are toys stored/kept? living room

4. Is there any visible evidence of chewed or peeling paint on the woodwork, furniture, toys?

Yes No X

Occupants Use Patterns

5. Which entrances are used most frequently?

front
living room

6. Which window(s) are opened most frequently?

Yes X No

7. Do you use window air conditioner?

If yes, where?

living room, bedroom

(Condensation often causes paint deterioration)

8. (a) Do any occupant members garden?

Yes No X

- (b) Location of garden

- (c) Are you planning any landscaping activities that will remove grass or ground covering?

Yes No X

9. (a) How often is the facility cleaned?

daily

- (b) What cleaning methods do you use?

10. (a) Did you recently complete any building renovations?

Yes No X

- (b) If yes, where?

- (c) Was building debris stored in the yard?

Yes No X

If yes, where?

11. Are you planning any building renovations?

Yes No X

If yes, where?

12. (a) Do any occupant members work in a lead-related industry?

Yes No X

- (b) If yes, where are dirty work clothes placed and cleaned?

Bldg 2 Apt B

Facility Questionnaire

(To be completed by occupant)

Children/Children's Habits

1. (a) Do you have any children that live in your home?

Yes _____ No ☒

(If no children, skip to question 5.)

- (b) If yes, how many? _____

Ages? _____

- (c) Record blood lead levels, if known. _____

- (d) Are there women of child-bearing age present?

Yes _____ No _____

2. Location of the rooms/areas where each child sleeps, eats, plays.

Name of child	Location of bedroom	Location of all rooms where child eats	Primary location where child plays indoors	Primary location where child plays outdoors

3. Where are toys stored/kept? _____

4. Is there any visible evidence of chewed or peeling paint on the woodwork, furniture, toys?

Yes _____ No _____

Occupants Use Patterns

5. Which entrances are used most frequently?

6. Which window(s) are opened most frequently?

7. Do you use window air conditioner?

If yes, where?

(Condensation often causes paint deterioration)

8. (a) Do any occupant members garden?

- (b) Location of garden _____

- (c) Are you planning any landscaping activities that will remove grass or ground covering?

9. (a) How often is the facility cleaned?

- (b) What cleaning methods do you use?

10. (a) Did you recently complete any building renovations?

- (b) If yes, where?

- (c) Was building debris stored in the yard?

If yes, where?

11. Are you planning any building renovations?

If yes, where?

12. (a) Do any occupant members work in a lead-related industry?

- (b) If yes, where are dirty work clothes placed and cleaned?

FRONT DOOR

KITCHEN - LIVING ROOM

Yes _____ No ☒Yes _____ No ☒Yes _____ No ☒

ONCE A WEEK

VACUUM CLEANING

Yes _____ No ☒Yes _____ No ☒Yes _____ No ☒Yes _____ No ☒

20

Facility Questionnaire

(To be completed by occupant)

Children/Children's Habits

1. (a) Do you have any children that live in your home? Yes ☒ No ☐

(If no children, skip to question 5.)

- (b) If yes, how many? 1

Ages? 8

- (c) Record blood lead levels, if known.

- (d) Are there women of child-bearing age present? Yes ☒ No ☐

2. Location of the rooms/areas where each child sleeps, eats, plays.

Name of child	Location of bedroom	Location of all rooms where child eats	Primary location where child plays indoors	Primary location where child plays outdoors
Michael	1st bedroom	Kitchen - Bedroom	Livingroom bedroom	back yard of VA

3. Where are toys stored/kept? closet

4. Is there any visible evidence of chewed or peeling paint on the woodwork, furniture, toys? Yes ☐ No ☒

Occupants Use Patterns

5. Which entrances are used most frequently?

6. Which window(s) are opened most frequently?

7. Do you use window air conditioner?

If yes, where?

(Condensation often causes paint deterioration)

8. (a) Do any occupant members garden?

- (b) Location of garden

- (c) Are you planning any landscaping activities that will remove grass or ground covering?

9. (a) How often is the facility cleaned?

- (b) What cleaning methods do you use?

10. (a) Did you recently complete any building renovations?

- (b) If yes, where?

- (c) Was building debris stored in the yard?

If yes, where?

11. Are you planning any building renovations?

If yes, where?

12. (a) Do any occupant members work in a lead-related industry?

- (b) If yes, where are dirty work clothes placed and cleaned?

All

Yes ☒ No ☐

Living room

Yes ☐ No ☒

Yes ☐ No ☒

Yes ☐ No ☐

Yes ☐ No ☐

Yes ☐ No ☐

Yes ☐ No ☒

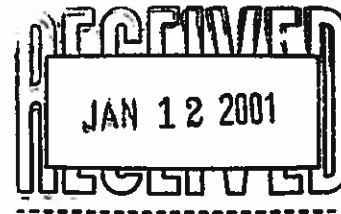
EMSL Analytical

<http://www.emsl.com>

59 Haddon Ave.
Westmont, NJ 08108
Phone: (856) 858-4800
Fax: 8568589551

Attention: Roger Herman
Maxim Technologies Inc.
600 South 25th Street
Billings, MT 59101
Phone 406-248-9161
Fax: 406-248-9282

12/27/00



The following report covers the analysis performed on samples submitted to EMSL Analytical on 12/13/00. The results are tabulated on the attached data pages for the following client designated project:

VA-Miles City

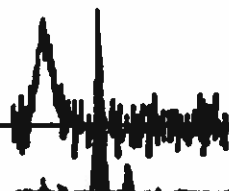
The reference number for these samples is EMSL Order #200003726. Please use this reference when calling about these samples.

If you have any questions, please do not hesitate to contact me at (856) 858-4800.

Reviewed and Approved By:

A handwritten signature in dark ink, appearing to read "Gerold J. Miller". The signature is fluid and cursive.

Gerold J. Miller, Ph.D.
Laboratory Manager
NJ Certification: 04653



EMSL Analytical

59 Haddon Ave., Westmont, NJ 08108

Phone: (856) 858-4800 Fax: 8568589551 Email: 20email

EMSL

Attn: Roger Herman
Maxim Technologies Inc.
600 South 25th Street
Billings, MT 59101

Fax: (406) 248-9282

Project: VA-Miles City

Phone: 406-248-9161

Customer ID: MAXI52

Customer PO:

Received: 12/13/00 11:00 AM

EMSL Order: 200003726

EMSL Project ID:

Lead in Wipes by Flame AAS (SW 846, 7420)

Client Sample Description	Lab ID	Analyzed	Area	Lead Concentration	Notes
2-1	0001	12/20/00	144 in ²	27.1 µg/ft ²	
2-2	0002	12/20/00	144 in ²	98.2 µg/ft ²	
2A1	0003	12/20/00	144 in ²	12.1 µg/ft ²	
2A2	0004	12/20/00	144 in ²	<10.0 µg/ft ²	
2A3	0005	12/20/00	144 in ²	<10.0 µg/ft ²	
2D1	0006	12/20/00	144 in ²	<10.0 µg/ft ²	
2D2	0007	12/26/00	144 in ²	<10.0 µg/ft ²	
2D3	0008	12/26/00	144 in ²	<10.0 µg/ft ²	
2D4	0009	12/26/00	144 in ²	<10.0 µg/ft ²	

Reporting limit is 10 ug/wipe

EMSL ANALYTICAL

Revised 7/1/89

CHAIN OF CUSTODY

206603726

LEAD

EMSL Rep:

Your Company

Name:

Street:

Box #:

City/State:

Phone Results to:

Name:

Telephone #:

Project

Name/Number:

DATE: 12/1/89

EMSL-Bill to:

Street:

Box #:

City/State:

Fax Results to:

Name:

Fax #:

Purchase

Order #:

Third party billing requires written authorization from third party

MATRIX	METHOD	INSTRUMENT	mdls	TAT
Lead Chips*	SW846-7420 or AOAC 5.009 (874.02)	Flame Atomic Absorption	0.01% ++	
Lead Wastewater	SW846-7420	Flame Atomic Absorption	0.4 mg/l water 50 mg/kg (ppm) soil	
Lead Soil +	or SW846-6010	ICP	0.1 mg/l water 10 mg/kg (ppm) soil	
Lead in Air***	NIOSH 7082	Flame Atomic Absorption	5 ug/filter	
	or NIOSH 7303	ICP	3.0 ug/filter	
Lead in Wipe	SW846-7420	Flame Atomic Absorption	10 ug/wipe	10 days
	or SW846-6010	ICP	3.0 ug/wipe	
TCLP Lead **	SW846-1311/7420	Flame Atomic Absorption	0.4 mg/l (ppm)	
	or SW846-6010	ICP	0.1 mg/l (ppm)	
Lead in Air****	NIOSH 7105	Graphite Furnace Atomic Absorption	0.03 ug/filter	
Lead Wastewater	SW846-7421	Graphite Furnace Atomic Absorption	0.003 mg/l (ppm) water	
Lead Soil +			0.3 mg/kg (ppm) soil	
Lead in Drinking Water (check state Certification Requirements)	EPA 239.2	Graphite Furnace Atomic Absorption	0.003 mg/l (ppm)	10 days
Total Dust	NIOSH 0500-0600	Gravimetric Reduction	0.0001g	

TAT (Turnaround) - 3 hours, 6 hours, Please call ahead to schedule.

12 hours (must arrive by 11:00 a.m),

24 hours (1day), 48 hours (2 days), 72 hours, 96 hours (3 days), 120 hours(4 days), 144 + hours (6-10 days)

* , ** , *** , **** , + , ++ Please Refer to Price Quote

SAMPLE #	LOCATION	Air volume, L Area, in ²	LAB #
2-1	Blk 2 - Common area, west	144 in ²	3726 1
2-2	Blk 2 - Common area	144 in ²	2
2A1	Blk 2 - Area A - Lead Room Wd St	144 in ²	3
2A2	Blk 2 - Area B - 2 in Soil	144 in ²	4
Relinquished By: (Person)	Received at EMSL By:		
Date:	Date:		

Note: Please duplicate this form and use additional sheets if necessary.

Revised 7/1/99

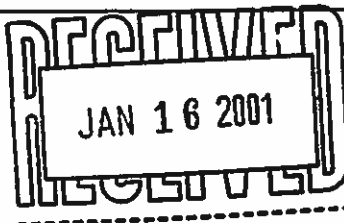
LEAD

Relinquished By: (Person)	Received at EMSL By: <i>Lampetta Bly</i>
Date	Date <i>12/13/12</i> <i>110</i>

Note: Please duplicate this form and use additional sheets if necessary.

EMSL Analytical

<http://www.emsl.com>



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Westmont, NJ 08108
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600 South 25th Street
Billings, MT 59101
Phone 406-248-9161
Fax: 406-248-9282

12/29/00

The following report covers the analysis performed on samples submitted to EMSL Analytical on 12/13/00. The results are tabulated on the attached data pages for the following client designated project:

VA-Miles City

The reference number for these samples is EMSL Order #200003731. Please use this reference when calling about these samples.

If you have any questions, please do not hesitate to contact me at (856) 858-4800.

Reviewed and Approved By:

A handwritten signature in black ink, appearing to read "Gerold J. Miller".

Gerold J. Miller, Ph.D.
Laboratory Manager
NJ Certification: 04653

EMSL Analytical

59 Haddon Ave., Westmont, NJ 08108

Phone: (856) 856-4800 Fax: 8568589551 Email: 20email

EMSL

Attn: Roger Herman
Maxim Technologies Inc.
600 South 25th Street
Billings, MT 59101

Fax: (406) 248-9282

Project: VA-Miles City

Phone: 406-248-9161

Customer ID: MAXI52

Customer PO:

Received: 12/13/00 11:00 AM

EMSL Order: 200003731

EMSL Project ID:

Lead in Water by Furnace AAS (EPA 200.9)

<i>Client Sample Description</i>	<i>Lab ID</i>	<i>Analyzed</i>	<i>Lead Concentration</i>	<i>Notes</i>
2 FD	0001	12/28/00	<0.003 mg/L	
2FL	0002	12/28/00	<0.003 mg/L	

EMSL ANALYTICAL

CHAIN OF CUSTODY

20003731

LEAD

Revised 7/1/99

EMSL Rep:

Your Company

Name:

Street:

Box #:

City/State:

Phone Results to:

Name:

Telephone #:

Project

Name/Number:

DATE: 12/11/00

EMSL-Bill to:

Street:

Box #:

City/State:

Fax Results to:

Name:

Fax #:

Purchase

Order #:

Third party billing requires written authorization from third party

Maxim Technologies

618 S 25th Street

Billings, MT

Zip: 59101

U4-Miles City

Maxim Technologies

618 S 25th St

Billings, MT

Zip: 59101

Roger Herman

406-248-9222

MATRIX	METHOD	INSTRUMENT	mdls	TAT
Lead Chips*	SW846-7420 or AOAC 5.009 (974.02)	Flame Atomic Absorption	0.01% ++	
Lead Wastewater	SW846-7420	Flame Atomic Absorption	0.4 mg/l water 50 mg/kg (ppm) soil	
Lead Soil +	or SW846-8010	ICP	0.1 mg/l water 10 mg/kg (ppm) soil	
Lead in Air***	NIOSH 7082	Flame Atomic Absorption	5 ug/filter	
	or NIOSH 7303	ICP	3.0 ug/filter	
Lead in Wipe	SW846-7420	Flame Atomic Absorption	10 ug/wipe	10 days
	or SW846-8010	ICP	3.0 ug/wipe	
TCLP Lead **	SW846-1311/7420	Flame Atomic Absorption	0.4 mg/l (ppm)	
	or SW846-8010	ICP	0.1 mg/l (ppm)	
Lead in Air ****	NIOSH 7105	Graphite Furnace Atomic Absorption	0.03 ug/filter	
Lead Wastewater	SW846-7421	Graphite Furnace Atomic Absorption	0.003 mg/l (ppm) water	
Lead Soil +			0.3 mg/kg (ppm) soil	
Lead in Drinking Water (check state Certification Requirements)	EPA 239.2	Graphite Furnace Atomic Absorption	0.003 mg/l (ppm)	10 days
Total Dust	NIOSH 0500-0600	Gravimetric Reduction	0.0001g	

TAT (Turnaround) - 3 hours, 6 hours, Please call ahead to schedule.

12 hours (must arrive by 11:00 a.m),

24 hours (1day), 48 hours (2 days), 72 hours, 96 hours (3 days), 120 hours(4 days), 144 + hours (5-10 days)

*, **, ***, ****, +, ++ Please Refer to Price Quote

SAMPLE #	LOCATION	Air volume, L Area, in ²	LAB #
2-1	Blk 2 - Common Entry Way	144 in ²	
2-2	Blk 2 - Laundry	144 in ²	
2 A1	Blk 2 - Apt A - Living Room NW Stl	144 in ²	
2 A2	Blk 2 - Apt A - Living Room South Stl	144 in ²	
Relinquished By: (Person)	Received at EMSL By:		
Date: 12/11/00	Date: 12/13/00 11 am		

Note: Please duplicate this form and use additional sheets if necessary.

12/15 Rec. of
Herman

Relinquished By: (Person)	Received at EMSL By: <i>Laura J. Benge</i>
Date	Date <i>12/13/12</i>

Note: Please indicate this form is for *118*

Note: Please duplicate this form and use additional sheets if necessary.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

AUG 21 1996

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

Dear Interested Party:

On March 6, 1996, the Environmental Protection Agency (EPA) and the Department of Housing and Urban Development (HUD) published a final rule, "Lead; Requirements for Disclosure of Known Lead-Based Paint and/or Lead-Based Paint Hazards in Housing," (61 FR 9064-9088). This final rule requires persons selling or leasing most residential housing built before 1978 to provide purchasers and renters with a federally approved lead hazard information pamphlet and to disclose known lead-based paint and/or lead-based paint hazards. The specific requirements of the final rule are discussed in detail in the March 1996 notice. For owners of more than four residential dwellings, the requirements are applicable beginning on September 6, 1996; and (2) For owners of one to four residential dwellings, the requirements are applicable beginning on December 6, 1996.

Subsequent to the publication of the final rule, EPA and HUD have received questions from the real estate community about implementation of the rule. EPA and HUD have developed the enclosed document entitled "Interpretive Guidance for the Real Estate Community for the Requirements for Disclosure of Information Concerning Lead-Based Paint in Housing" to supplement the information presented in the final rule. This guidance will be expanded and updated as necessary. This document and others relating to the lead disclosure rule may also be accessed via the EPA Lead Program's home page through the Internet as follows: http://www.epa.gov/docs/lead_wh.html

I hope that you will find the enclosed guidance document useful in determining your obligations under the lead disclosure rule.

Sincerely,

A handwritten signature in dark ink, appearing to read "John W. Melone", written over a horizontal line.

John W. Melone, Director
Chemical Management Division

Enclosure

Sample Disclosure Format for Target Housing Sales
Disclosure of Information on Lead-Based Paint and Lead-Based Paint Hazards

Lead Warning Statement

Every purchaser of any interest in residential real property on which a residential dwelling was built prior to 1978 is notified that such property may present exposure to lead from lead-based paint that may place young children at risk of developing lead poisoning. Lead poisoning in young children may produce permanent neurological damage, including learning disabilities, reduced intelligence quotient, behavioral problems, and impaired memory. Lead poisoning also poses a particular risk to pregnant women. The seller of any interest in residential real property is required to provide the buyer with any information on lead-based paint hazards from risk assessments or inspections in the seller's possession and notify the buyer of any known lead-based paint hazards. A risk assessment or inspection for possible lead-based paint hazards is recommended prior to purchase.

Seller's Disclosure (initial)

_____ (a) Presence of lead-based paint and/or lead-based paint hazards (check one below):

☐ Known lead-based paint and/or lead-based paint hazards are present in the housing (explain).

☐ Seller has no knowledge of lead-based paint and/or lead-based paint hazards in the housing.

_____ (b) Records and reports available to the seller (check one below):

☐ Seller has provided the purchaser with all available records and reports pertaining to lead-based paint and/or lead-based paint hazards in the housing (list documents below).

☐ Seller has no reports or records pertaining to lead-based paint and/or lead-based paint hazards in the housing.

Purchaser's Acknowledgment (initial)

_____ (c) Purchaser has received copies of all information listed above.

_____ (d) Purchaser has received the pamphlet *Protect Your Family from Lead in Your Home*.

_____ (e) Purchaser has (check one below):

☐ Received a 10-day opportunity (or mutually agreed upon period) to conduct a risk assessment or inspection for the presence of lead-based paint and/or lead-based paint hazards; or

☐ Waived the opportunity to conduct a risk assessment or inspection for the presence of lead-based paint and/or lead-based paint hazards.

Agent's Acknowledgment (initial)

_____ (f) Agent has informed the seller of the seller's obligations under 42 U.S.C. 4582(d) and is aware of his/her responsibility to ensure compliance.

Certification of Accuracy

The following parties have reviewed the information above and certify, to the best of their knowledge, that the information provided by the signatory is true and accurate.

_____ Seller	_____ Date
_____ Agent	_____ Date
_____ Purchaser	_____ Date

_____ Seller	_____ Date
_____ Agent	_____ Date
_____ Purchaser	_____ Date

Sample Disclosure Format for Target Housing Rentals and Leases
Disclosure of Information on Lead-Based Paint and Lead-Based Paint Hazards

Lead Warning Statement

Housing built before 1978 may contain lead-based paint. Lead from paint, paint chips, and dust can pose health hazards if not taken care of properly. Lead exposure is especially harmful to young children and pregnant women. Before renting pre-1978 housing, landlords must disclose the presence of known lead-based paint and lead-based paint hazards in the dwelling. Tenants must also receive a Federally approved pamphlet on lead poisoning prevention.

Lessor's Disclosure (initial)

_____ (a) Presence of lead-based paint or lead-based paint hazards (check one below):

☐ Known lead-based paint and/or lead-based paint hazards are present in the housing (explain).

☐ Lessor has no knowledge of lead-based paint and/or lead-based paint hazards in the housing.

_____ (b) Records and reports available to the lessor (check one below):

☐ Lessor has provided the lessee with all available records and reports pertaining to lead-based paint and/or lead-based paint hazards in the housing (list documents below).

☐ Lessor has no reports or records pertaining to lead-based paint and/or lead-based paint hazards in the housing.

Lessee's Acknowledgment (initial)

_____ (c) Lessee has received copies of all information listed above.

_____ (d) Lessee has received the pamphlet *Protect Your Family from Lead in Your Home*.

Agent's Acknowledgment (initial)

_____ (e) Agent has informed the lessor of the lessor's obligations under 42 U.S.C. 4582(d) and is aware of his/her responsibility to ensure compliance.

Certification of Accuracy

The following parties have reviewed the information above and certify, to the best of their knowledge, that the information provided by the signatory is true and accurate.

Lessor Date

Lessee Date

Agent Date

Lessor Date

Lessee Date

Agent Date



FACT SHEET

EPA and HUD Move to Protect Children from Lead-Based Paint Poisoning; Disclosure of Lead-Based Paint Hazards in Housing

SUMMARY

The Environmental Protection Agency (EPA) and the Department of Housing and Urban Development (HUD) are announcing efforts to ensure that the public receives the information necessary to prevent lead poisoning in homes that may contain lead-based paint hazards. Beginning this fall, most home buyers and renters will receive known information on lead-based paint and lead-based paint hazards during sales and rentals of housing built before 1978.

Buyers and renters will receive specific information on lead-based paint in the housing as well as a Federal pamphlet with practical, low-cost tips on identifying and controlling lead-based paint hazards. Sellers, landlords, and their agents will be responsible for providing this information to the buyer or renter before sale or lease.

LEAD-BASED PAINT IN HOUSING

Approximately three-quarters of the nation's housing stock built before 1978 (approximately 64 million dwellings) contains some lead-based paint. When properly maintained and managed, this paint poses little risk. However, 1.7 million children have blood-lead levels above safe limits, mostly due to exposure to lead-based paint hazards.

EFFECTS OF LEAD POISONING

Lead poisoning can cause permanent damage to the brain and many other organs and causes reduced intelligence and behavioral problems. Lead can also cause abnormal fetal development in pregnant women.

BACKGROUND

To protect families from exposure to lead from paint, dust, and soil, Congress passed the Residential Lead-Based Paint Hazard Reduction Act

of 1992, also known as Title X. Section 1018 of this law directed HUD and EPA to require the disclosure of known information on lead-based paint and lead-based paint hazards before the sale or lease of most housing built before 1978.

WHAT IS REQUIRED

Before ratification of a contract for housing sale or lease:

- Sellers and landlords must disclose known lead-based paint and lead-based paint hazards and provide available reports to buyers or renters.

- Sellers and landlords must give buyers and renters the pamphlet, developed by EPA, HUD, and the Consumer Product Safety Commission (CPSC), titled *Protect Your Family from Lead in Your Home*.



- Home buyers will get a 10-day period to conduct a lead-based paint inspection or risk assessment at their own expense. The rule gives the two parties flexibility to negotiate key terms of the evaluation.
- Sales contracts and leasing agreements must include certain notification and disclosure language.
- Sellers, lessors, and real estate agents share responsibility for ensuring compliance.

Sample Disclosure Format for Target Housing Rentals and Leases
Disclosure of Information on Lead-Based Paint and Lead-Based Paint Hazards

Lead Warning Statement

Housing built before 1978 may contain lead-based paint. Lead from paint, paint chips, and dust can pose health hazards if not taken care of properly. Lead exposure is especially harmful to young children and pregnant women. Before renting pre-1978 housing, landlords must disclose the presence of known lead-based paint and lead-based paint hazards in the dwelling. Tenants must also receive a Federally approved pamphlet on lead poisoning prevention.

Lessor's Disclosure (initial)

_____ (a) Presence of lead-based paint or lead-based paint hazards (check one below):

☐ Known lead-based paint and/or lead-based paint hazards are present in the housing (explain).

☐ Lessor has no knowledge of lead-based paint and/or lead-based paint hazards in the housing.

_____ (b) Records and reports available to the lessor (check one below):

☐ Lessor has provided the lessee with all available records and reports pertaining to lead-based paint and/or lead-based paint hazards in the housing (list documents below).

☐ Lessor has no reports or records pertaining to lead-based paint and/or lead-based paint hazards in the housing.

Lessee's Acknowledgment (initial)

_____ (c) Lessee has received copies of all information listed above.

_____ (d) Lessee has received the pamphlet *Protect Your Family from Lead in Your Home*.

Agent's Acknowledgment (initial)

_____ (e) Agent has informed the lessor of the lessor's obligations under 42 U.S.C. 4582(d) and is aware of his/her responsibility to ensure compliance.

Certification of Accuracy

The following parties have reviewed the information above and certify, to the best of their knowledge, that the information provided by the signatory is true and accurate.

Lessor Date

Lessor Date

Lessee Date

Lessee Date

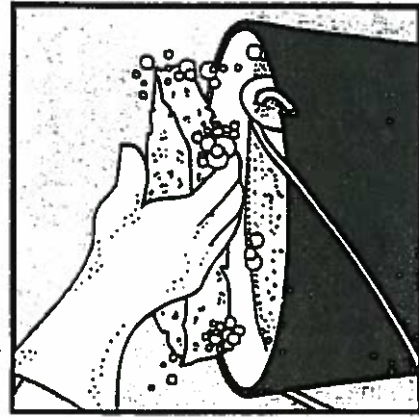
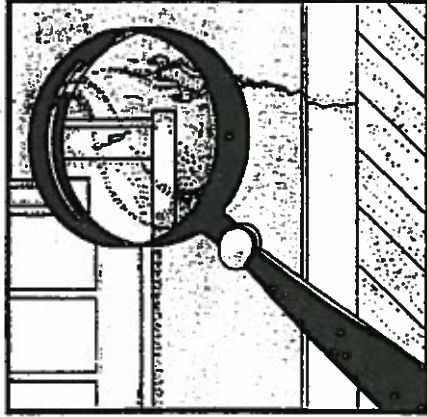
Agent Date

Agent Date

Simple Steps To Protect Your Family From Lead Hazards

If you think your home has high levels of lead:

- ◆ Get your young children tested for lead, even if they seem healthy.
- ◆ Wash children's hands, bottles, pacifiers, and toys often.
- ◆ Make sure children eat healthy, low-fat foods.
- ◆ Get your home checked for lead hazards.
- ◆ Regularly clean floors, window sills, and other surfaces.
- ◆ Wipe soil off shoes before entering house.
- ◆ Talk to your landlord about fixing surfaces with peeling or chipping paint.
- ◆ Take precautions to avoid exposure to lead dust when remodeling or renovating (call 1-800-424-LEAD for guidelines).
- ◆ Don't use a belt-sander, propane torch, dry scraper, or dry sandpaper on painted surfaces that may contain lead.
- ◆ Don't try to remove lead-based paint yourself.



Protect Your Family From Lead In Your Home



United States
Environmental Protection
Agency



United States Consumer
Product Safety Commission

U.S. EPA Washington DC 20460
U.S. EPA 100-100-10007

EPA747-K-94-001
Rev. 10/93

State Health and Environmental Agencies

Some cities and states have their own rules for lead-based paint activities. Check with your state agency (listed below) to see if state or local laws apply to you. Most state agencies can also provide information on finding a lead abatement firm in your area, and on possible sources of financial aid for reducing lead hazards.

State/Region	Phone Number	Missouri	(314) 526-4911
Alabama	(205) 242-5661	Montana	(406) 444-3671
Alaska	(907) 465-5152	Nebraska	(402) 471-2451
Arkansas	(501) 661-2534	Nevada	(702) 687-6615
Arizona	(602) 542-7307	New Hampshire	(603) 271-4507
California	(510) 450-2424	New Jersey	(609) 633-2043
Colorado	(303) 692-3012	New Mexico	(505) 841-1024
Connecticut	(203) 566-5808	New York	(800) 458-1158
Washington, DC	(202) 727-9850	North Carolina	(919) 715-3293
Delaware	(302) 739-4735	North Dakota	(701) 328-5188
Florida	(904) 488-3385	Ohio	(614) 466-1450
Georgia	(404) 657-6514	Oklahoma	(405) 271-5220
Hawaii	(808) 832-5860	Oregon	(503) 248-5240
Idaho	(208) 332-5544	Pennsylvania	(717) 782-2884
Illinois	(800) 545-2200	Rhode Island	(401) 277-3424
Indiana	(317) 382-6662	South Carolina	(803) 935-7945
Iowa	(800) 972-2026	South Dakota	(605) 773-3153
Kansas	(913) 296-0189	Tennessee	(615) 741-5683
Kentucky	(502) 564-2154	Texas	(512) 834-6600
Louisiana	(504) 765-0219	Utah	(801) 536-4000
Massachusetts	(800) 532-9571	Vermont	(802) 863-7231
Maryland	(410) 631-3859	Virginia	(800) 523-4019
Maine	(207) 287-4311	Washington	(206) 753-2556
Michigan	(517) 335-8885	West Virginia	(304) 558-2981
Minnesota	(612) 627-5498	Wisconsin	(608) 266-5885
Mississippi	(601) 960-7463	Wyoming	(307) 777-7391

IMPORTANT!

Lead From Paint, Dust, and Soil Can Be Dangerous If Not Managed Properly

FACT: Lead exposure can harm young children and babies even before they are born.

FACT: Even children that seem healthy can have high levels of lead in their bodies.

FACT: People can get lead in their bodies by breathing or swallowing lead dust, or by eating soil or paint chips with lead in them.

FACT: People have many options for reducing lead hazards. In most cases, lead-based paint that is in good condition is not a hazard.

FACT: Removing lead-based paint improperly can increase the danger to your family.

If you think your home might have lead hazards, read this pamphlet to learn some simple steps to protect your family.

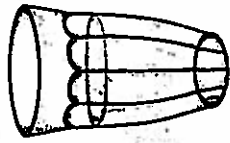
Other Sources of Lead

- ◆ **Drinking water.** Your home might have plumbing with lead or lead solder. Call your local health department or water supplier to find out about testing your water. You cannot see, smell, or taste lead, and boiling your water will not get rid of lead. If you think your plumbing might have lead in it:

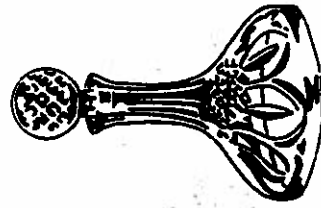
- Use only cold water for drinking and cooking.
- Run water for 15 to 30 seconds before drinking it, especially if you have not used your water for a few hours.

- ◆ **The job.** If you work with lead, you could bring it home on your hands or clothes. Shower and change clothes before coming home. Launder your clothes separately from the rest of your family's.

- ◆ **Old painted toys and furniture.**
- ◆ **Food and liquids stored in lead crystal or lead-glazed pottery or porcelain.**
- ◆ **Lead smelters or other industries that release lead into the air.**
- ◆ **Hobbies that use lead, such as making pottery or stained glass, or refinishing furniture.**
- ◆ **Folk remedies that contain lead, such as "greta" and "azarcon" used to treat an upset stomach.**



While paint, dust, and soil are the most common lead hazards, other lead sources also exist.



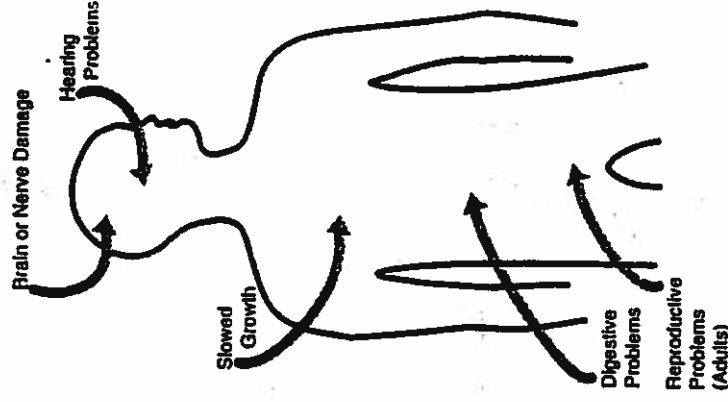
Lead's Effects

If not detected early, children with lead in their bodies can suffer from:

- ◆ Damage to the brain and nervous system
- ◆ Behavior and learning problems (such as hyperactivity)
- ◆ Slowed growth
- ◆ Hearing problems
- ◆ Headaches

Lead is also harmful to adults. Adults can suffer from:

- ◆ Difficulties during pregnancy
- ◆ Other reproductive problems (in both men and women)
- ◆ High blood pressure
- ◆ Digestive problems
- ◆ Nerve disorders
- ◆ Memory and concentration problems
- ◆ Muscle and joint pain

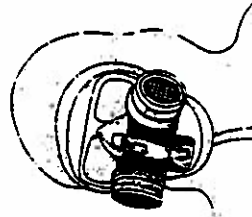


Lead affects the body in many ways.

How To Significantly Reduce Lead Hazards

Removing lead improperly can increase the hazard to your family by spreading even more lead dust around the house.

Always use a professional who is trained to remove lead hazards safely.



In addition to day-to-day cleaning and good nutrition:

- ◆ You can temporarily reduce lead hazards by taking actions like repairing damaged painted surfaces and planting grass to cover soil with high lead levels. These actions (called "interim controls") are not permanent solutions and will not eliminate all risks of exposure.
- ◆ To permanently remove lead hazards, you must hire a lead "abatement" contractor. Abatement (or permanent hazard elimination) methods include removing, sealing, or enclosing lead-based paint with special materials. Just painting over the hazard with regular paint is not enough.

Always hire a person with special training for correcting lead problems—someone who knows how to do this work safely and has the proper equipment to clean up thoroughly. If possible, hire a certified lead abatement contractor. Certified contractors will employ qualified workers and follow strict safety rules as set by their state or by the federal government.

Call your state agency (see page 12) for help with locating qualified contractors in your area and to see if financial assistance is available.

Where Lead Is Likely To Be a Hazard

Lead-based paint that is in good condition is usually not a hazard.

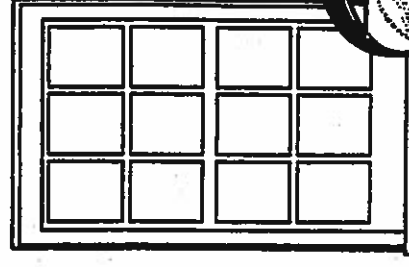
Peeling, chipping, chalking, or cracking lead-based paint is a hazard and needs immediate attention.

Lead-based paint may also be a hazard when found on surfaces that children can chew or that get a lot of wear-and-tear. These areas include:

- ◆ Windows and window sills.
- ◆ Doors and door frames.
- ◆ Stairs, railings, and banisters.
- ◆ Porches and fences.

Lead dust can form when lead-based paint is dry scraped, dry sanded, or heated. Dust also forms when painted surfaces bump or rub together. Lead chips and dust can get on surfaces and objects that people touch. Settled lead dust can reenter the air when people vacuum, sweep, or walk through it.

Lead in soil can be a hazard when children play in bare soil or when people bring soil into the house on their shoes. Call your state agency (see page 12) to find out about soil testing for lead.



Lead from paint chips, which you can see, and lead dust, which you can't always see, can both be serious hazards